Korean Journal of English Language and Linguistics, Vol 25, December 2025, pp. 1690-1703
DOI: 10.15738/kjell.25..202512.1690

KOREAN JOURNAL OF ENGLISH LANGUAGE AND LINGUISTICS

ISSN: 1598-1398 / e-ISSN 2586-7474

http://journal.kasell.or.kr

Case and Failed Sprouting in Extraction out of Elided VP

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Received: September 11, 2025
Revised: December 15, 2025
Accepted: December 18, 2025

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ABSTRACT

Park, Myung-Kwan and Jihyun Kim. 2025. Case and failed sprouting in extraction out of elided VP. *Korean Journal of English Language and Linguistics* 25, 1690-1703.

This paper examines the distribution and licensing of sprouting, a type of ellipsis where a remnant lacks an overt antecedent. We begin by reviewing the analysis of Overfelt (2024), who observed a fundamental asymmetry: sprouting is licensed in clausal ellipses (e.g., sluicing and stripping) but is systematically excluded in predicate ellipses (e.g., VP ellipsis and Pseudogapping). Overfelt's account attributes this to distinct antecedent recovery mechanisms, positing that clausal ellipses can access discourse-level antecedents via the Question Under Discussion (QUD), whereas predicate ellipses are restricted to syntactic antecedents. We then present a crucial refinement to this generalization based on the findings of Orth & Yoshida (2025). Their work demonstrates that predicate ellipses are not uniform, as sprouting is systematically excluded in Verbal Gapping but is possible with PP remnants in Pseudogapping. However, their account leaves a critical open problem: it cannot explain why DP sprouting remains uniformly ungrammatical in Pseudogapping. To explain this more detailed pattern, we advance a Case-theoretic analysis. Our account proposes that implicit DP arguments cannot sprout because they are Case-licensed inside the VP, preventing them from undergoing the necessary movement for ellipsis licensing. In contrast, implicit PP arguments originate outside the VP in an applicative projection, allowing the VP to serve as a valid ellipsis site and thereby permitting PP sprouting in Pseudogapping. This approach provides a principled explanation for the DP/PP asymmetry in Pseudogapping.

KEYWORDS

Sprouting, clausal and predicate ellipsis, gapping and pseudogapping, case licensing

1. Introduction

Ellipsis refers to cases in which material that is syntactically represented in other contexts is absent but nevertheless receives a full semantic interpretation (Gengel 2013, Merchant 2001, Overfelt 2024). A wide variety of constructions fall under this label, including VP ellipsis, sluicing, stripping, gapping, and pseudogapping (Overfelt 2024). The study of ellipsis has been central in theoretical linguistics because the presence of interpretation without overt form provides direct evidence about how syntax, semantics, and discourse interact.

Among these various types of ellipsis, sluicing is particularly noteworthy, as it involves the omission of clausal material in embedded interrogative clauses (Chung et al.1995, Lasnik 2001, Merchant 2001, Ross 1969). A canonical illustration is given in (1).

(1) John met someone, but I don't know who [e].

Here the wh-remnant *who* survives, while the remainder of the clause (*John met x*) is elided. The sentence is nevertheless fully interpretable, since the meaning of the elided material can be reconstructed from the antecedent clause. Precisely because sluicing makes visible the relationship between the remnant and its antecedent, it has served as a central testing ground in the theory of ellipsis.

It has been known that sluicing can be divided into two descriptive subtypes. In merger sluicing, the remnant corresponds to an overt correlate in the antecedent clause. In sprouting, by contrast, no overt correlate is available. The contrast is shown in (2) and (3).

(2) a. Merger sluicing
Sue will read something, but I forget what.

(3) b. Sprouting
Sue will read, but I forget what.

In (2a), the remnant *what* is licensed because it has an overt correlate (*something*) in the antecedent clause. The missing material in the second conjunct can therefore be reconstructed from the first clause, with the correlate directly supporting the interpretation of the *wh*-remnant. In (2b), by contrast, no such correlate is present in the antecedent. The *wh*-remnant *what* appears without syntactic support, yet the sentence is still interpretable. This type of case is referred to as sprouting, and its interpretability is generally attributed to discourse mechanisms, specifically recovery through the Question Under Discussion (QUD) (Chung et al. 1995, Merchant 2001).

A central empirical observation emphasized by Overfelt (2024) is that sprouting is not uniformly available across ellipsis environments. Specifically, sprouting is available in clausal ellipses (CE) but is systematically excluded in predicate ellipses (PE). In other words, sprouting is attested in constructions such as sluicing, fragment answers, and stripping, but uniformly ungrammatical in VP ellipsis and Pseudogapping. This asymmetry forms the starting point for Overfelt's analysis and provides the basis for a generalization that connects the availability of sprouting to the structural size of the ellipsis site. This empirical asymmetry can be illustrated by contrasting clausal and predicate ellipses, as shown in (4).

(4) a. Clausal ellipsis: sluicing
Sue will read, but I forget what$_1$ ⟨$_{IP}$ ~~Sue will read x_1~~⟩.

b. Predicate ellipsis: VP ellipsis
*Pam will read, but I forget what Sue will ⟨$_{VP}$ ~~read x_1~~⟩.

In (4a), the antecedent clause *Sue will read* contains no overt DP in the object position, and thus provides no correlate for the wh-remnant *what*. The absence of such a correlate is the defining feature of sprouting. Nevertheless, the sentence remains grammatical, since in clausal ellipses like sluicing the interpretation of the remnant can be recovered through discourse, specifically via the QUD. By contrast, in (4b) the same configuration is attempted under VP ellipsis, where the ellipsis site is sub-clausal. Here too the remnant *what* lacks an overt correlate, but the sentence is ungrammatical.

This asymmetry highlights the central question driving current research: under what conditions is sprouting licensed, and why does its availability vary across different ellipsis types? Addressing this issue requires examining not only Overfelt's (2024) account but also the refinements proposed by Orth and Yoshida (2025), who present evidence that sprouting is not uniformly excluded from VP ellipsis. However, while Orth and Yoshida (2025) demonstrate that Pseudogapping *can* license PP sprouting, their account cannot explain why DP sprouting remains ungrammatical. This crucial unexplained DP/PP asymmetry in Pseudogapping is the open problem that our Case-theoretic analysis resolves by integrating independently motivated constraints on Case licensing and argument structure. We propose a Case-theoretic account according to which implicit DP arguments, Case-licensed within the VP, cannot undergo the necessary movement for ellipsis licensing, while implicit PP arguments, introduced outside the VP in an applicative projection, remain compatible with VP-ellipsis.

In the remainder of this paper, we build on this starting point. Sections 2 and 3 review previous accounts, Section 4 develops our Case-theoretic analysis, and Section 5 concludes.

2. Overfelt (2024): A QUD-Based Analysis

Overfelt (2024) addresses the question of why sprouting is licensed in clausal ellipses but not in predicate ellipses. His central proposal is summarized in (5).

(5) Sprouting from an ellipsis site E is not permitted if E is sub-clausal. (Overfelt 2024, p. 206)

This generalization captures the empirical asymmetry noted in the Introduction: sprouting is attested in clausal ellipses, but systematically excluded in predicate ellipses. Overfelt argues that this pattern is not accidental, but reflects fundamental differences in how antecedents for ellipsis are recovered. Clausal ellipses permit recovery either from overt syntax or from discourse (via the QUD), thereby making sprouting possible in the absence of an overt correlate. Predicate ellipses, by contrast, require recovery strictly from overt syntax, which makes them incompatible with sprouting.

2.1 Empirical Contrast: Clausal vs. Predicate Ellipses

The empirical foundation for Overfelt's generalization lies in the contrast between clausal and predicate ellipses. To establish this contrast, Overfelt (2024) systematically compares environments in which a *wh*-remnant is licensed without an overt correlate. The crucial observation is that clausal ellipses—such as sluicing, fragment answers, and stripping—permit sprouting remnants, while predicate ellipses—such as VP ellipsis and Pseudogapping—do not. This contrast holds even when the structural configurations are otherwise parallel, suggesting that the availability of sprouting is sensitive to the size of the ellipsis site. The relevant data are given in (6)–(7).

(6) Clausal ellipses with sprouting
  a. *Sue will READ, but I forget what.* (sluicing; Chung et al. 2011)
  b. *Q: Will Sue READ? – A: Yeah, the BOOK.* (fragment answer; Weir 2014)
  c. *Sue will READ, but not the BOOK.* (stripping; Nakao et al. 2012)

(7) Predicate ellipses with sprouting
  a. **Pam will READ, but I forget what Sue will.* (VP ellipsis)
  b. **Pam will READ, and the BOOK Sue will.* (VP ellipsis with contrastive topic)
  c. **Pat will READ, but she won't the BOOK.* (Pseudogapping)

(6a) illustrates sluicing with sprouting. The remnant *what* appears in the ellipsis clause even though there is no overt DP in the antecedent clause (*Sue will READ*) that could serve as its correlate. This makes it a textbook case of sprouting: the remnant survives without syntactic support, and its interpretation must be supplied by discourse. Yet the sentence is acceptable, showing that clausal ellipsis can license such remnants. (6b) is a fragment answer. The remnant *the BOOK* stands alone as a reply to the question *Will Sue READ?*. Here again, there is no overt correlate in the antecedent clause, but the discourse question provides a set of alternatives that license the fragment. This demonstrates that sprouting-type remnants are possible in fragment answer ellipsis, which is also clausal. (6c) involves stripping. In the second clause, *the BOOK* is left as the only overt remnant, with the verb elided. The antecedent clause (*Sue will READ*) does not contain an overt DP to contrast with *the BOOK*. Nonetheless, the discourse context supports the interpretation (e.g. contrasting with an implicit alternative such as *the article*), so the example is judged acceptable. Thus, stripping patterns with other clausal ellipses in permitting sprouting.

Turning to predicate ellipses, (7a) attempts VP ellipsis with sprouting. The remnant *what* appears without an overt correlate in the antecedent VP (*Pam will READ*). The result is unacceptable, indicating that VP ellipsis does not tolerate sprouting. In (7b), a contrastive-topic version of VP ellipsis is tested: *the BOOK* appears as a remnant, with no explicit correlate in the antecedent. Again, the sentence is ungrammatical, confirming that VP ellipsis requires overt syntactic correlates. Finally, (7c) shows Pseudogapping with a sprouting remnant *the BOOK*. The intended reading would be "Pat will read something, but she won't read the book." However, with no correlate available in the first clause, the sentence fails. This provides further evidence that predicate ellipses uniformly rule out sprouting.

Together, the data in (6)–(7) establish the descriptive asymmetry: sprouting is licensed in clausal ellipses but not in predicate ellipses.

2.2 The Redundancy Condition on Ellipsis

To explain these patterns, Overfelt (2024) adopts Rooth's (1992) focus semantics and proposes the Redundancy Condition in (8).

(8) Redundancy Condition on Ellipsis
  Ellipsis of some XP is permitted only if:
  i. there is a Focus Domain (FD) that contains XP,
  ii. there is an Antecedent Constituent (AC), and
  iii. $[\![AC]\!]^o \subseteq [\![FD]\!]^f$.

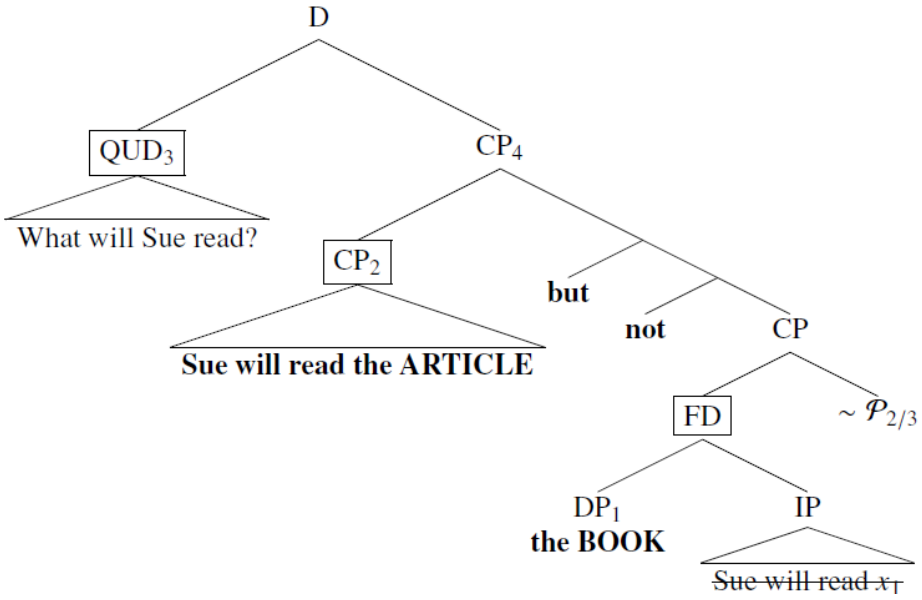
In this formulation, XP is the elided phrase, FD is the focus domain containing XP and the remnant, and AC is the

antecedent constituent. ⟦…⟧^{o} represents ordinary semantic value, while ⟦…⟧^{f} represents focus semantic value, i.e. the set of alternatives generated by focus marking. Intuitively, the ellipsis is licensed only if the meaning of the antecedent is included in the set of focus alternatives at the ellipsis site.

Overfelt argues that clausal ellipses, such as stripping, permit sprouting precisely because they have dual-recovery options for their antecedents. Consider the case of Stripping and the associated representation in (9).

(9) a. Sue will read the ARTICLE but not the BOOK$_1$ ⟨$_{IP}$ ~~Sue will read x_1~~⟩.

b.



(Overfelt 2024, p. 208)

In clausal ellipses, the redundancy condition can be satisfied in two ways. (10) illustrates recovery from an overt antecedent, while (11) shows recovery from a discourse-level QUD such as *What will Sue read?*. In both cases, the antecedent's meaning is included in the focus alternatives, so the condition is met and sprouting is licensed.

(10) i. ⟦ FD ⟧^{f} = { p : p = that Sue will read x | $x \in Alt$ (the book) }
ii. ⟦ CP2 ⟧^{o} = { that Sue will read the article}
iii. ⟦ CP2 ⟧^{o} ⊆ ⟦ FD ⟧^{f} , ellipsis is permitted

(11) i. ⟦ FD ⟧^{f} = { p : p = that Sue will read x | $x \in Alt$ (the book) }
ii. [QUD What will Sue read?]$_3$
⟦ QUD3 ⟧^{o} = { p : p = that Sue will read x | $x \in Alt$ (what) }
iii. ⟦ QUD3 ⟧^{o} ⊆ ⟦ FD ⟧^{f} , ellipsis is permitted

This duality—licensing either via overt syntax or via a discourse QUD—explains why clausal ellipses can host sprouting remnants.

2.3 The Role of the QUD and the Failure of Predicate Ellipses

The situation is different for predicate ellipses. Overfelt (2024) makes a strong claim about their licensing conditions: predicate ellipsis cannot recover an antecedent from a discourse question, i.e., the QUD. While clausal ellipses allow recovery either from overt syntax or from the discourse-level QUD, predicate ellipses are restricted to recovery from overt syntactic material, as originally proposed by Hankamer and Sag (1976) (Overfelt 2024: 223). This restriction creates a fundamental incompatibility with sprouting, since sprouting by definition lacks an overt correlate.

The reason is semantic: the type of focus domain (FD) created in predicate ellipses is incompatible with the type of meaning supplied by a QUD. In clausal ellipses, by contrast, both the FD and the QUD denote sets of propositions, so the redundancy condition can be satisfied. For example, in the stripping sentence in (9) *Sue will read the ARTICLE but not the BOOK*, the FD created by the remnant the BOOK yields a set of propositional alternatives such as {Sue will read the article, Sue will read the book, Sue will read the newspaper, …}. The antecedent clause *Sue will read the ARTICLE* denotes one proposition within this set, and an implicit QUD like *What will Sue read?* also denotes a set of propositions of the same type. Since the AC and the QUD both unify with the FD's focus alternatives, the redundancy condition is satisfied, and sprouting is licensed in clausal ellipsis.

Predicate ellipses, however, stand in sharp contrast. Here the FD is of predicate type (⟨e,t⟩), whereas the QUD continues to supply propositional alternatives. Because these semantic types cannot be unified, discourse-based recovery is unavailable, leaving overt syntax as the only option. This incompatibility becomes clear in Pseudogapping, illustrated in (12).

(12) [CP Sue will read]2 but not [[the BOOK1 ⟨IP Sue will read x_1 ⟩] ~ P2]
i. ⟦ FD ⟧^{f} = { $p : p$ = that Sue will read $x \mid x \in Alt$ (the book) }
ii. ⟦ CP2 ⟧^{o} = { that Sue will read }
iii. ⟦ CP2 ⟧$^o \notin$ ⟦ FD ⟧^{f} , ellipsis is not permitted

(Overfelt 2024, p. 211)

In (11), the remnant the BOOK surfaces in the ellipsis clause, but the antecedent clause (Sue will read) contains no overt DP object that could serve as an Antecedent Constituent (AC). The redundancy condition therefore cannot be satisfied syntactically. One might attempt to treat the discourse question *What will Sue read?* as the AC, but this too fails: the QUD denotes a set of propositions, while the FD in predicate ellipsis is of predicate type ⟨e,t⟩. Because these types are incompatible, the subset relation required by the redundancy condition cannot be established. As a result, the derivation crashes, and sprouting is systematically excluded in predicate ellipsis.

2.4 Interim Summary

In sum, Overfelt (2024) treats sprouting as a diagnostic for ellipsis size: clausal ellipses permit sprouting because antecedent recovery can proceed via syntax or discourse, whereas predicate ellipses, restricted to syntactic recovery, uniformly exclude it. This generalization, while providing a principled explanation for the contrast between sluicing and VP ellipsis, should be viewed primarily as a diagnostic based on ellipsis size. As we will see in Section 3, this categorical ban on sprouting in predicate ellipses faces a crucial empirical challenge from Pseudogapping data.

3. Orth and Yoshida (2025): Refining the Distribution of Sprouting

While Overfelt (2024) proposes a categorical restriction excluding sprouting from all predicate ellipses, subsequent work by Orth and Yoshida (2025) shows that this prediction does not hold across all cases. Their study demonstrates that predicate ellipses are not uniform with respect to sprouting. In particular, they argue that Verbal Gapping patterns with Overfelt's claim in consistently disallowing sprouting, but Pseudogapping behaves differently: here sprouting is possible with PP remnants, though still excluded with DP remnants.

3.1 Verbal Gapping with Sprouting

Orth and Yoshida begin by comparing Verbal Gapping and Pseudogapping. They observe that in Verbal Gapping, Sprouting is indeed impossible, fully consistent with Overfelt's generalization. (13a) is an instance of Verbal Gapping, where the verb is elided in the second conjunct and the remnants each have overt correlates in the first conjunct. (13b), by contrast, attempts Verbal Gapping with a sprouted remnant, since the PP *to his mother* has no overt correlate in the antecedent.

(13) a. Theresa served dinner to the guest and Jonathan ~~served dinner~~ to the hosts.
b. *Theresa served dinner and Jonathan ~~served dinner~~ to the hosts.
(Orth and Yoshida 2025, p. 2)

In (13a), the antecedent clause *Theresa served dinner to the guest* contains the object DP *dinner*, which serves as the overt correlate for the PP remnant *to the hosts* in the second clause. The ellipsis site in *Jonathan served [dinner] to the hosts* can thus be recovered straightforwardly from the first conjunct, yielding a grammatical result. In (13b), however, the first conjunct *Theresa served dinner* lacks an overt PP argument corresponding to *to the hosts*. This makes *to the hosts* a sprouting remnant with no overt correlate in the antecedent. Unlike sluicing or stripping, Verbal Gapping cannot appeal to the discourse QUD to supply an antecedent, so the sentence is ungrammatical. The contrast between (13a) and (13b) shows that Verbal Gapping systematically disallows sprouting, which is consistent with Overfelt's claim.

3.2 Pseudogapping with Sprouting

The pattern differs when we turn to Pseudogapping. In contrast to Verbal Gapping, Pseudogapping displays a more differentiated pattern with respect to sprouting. Orth and Yoshida (2025) show that while Verbal Gapping categorically excludes sprouted remnants, Pseudogapping permits sprouting under certain conditions. To illustrate, consider the Pseudogapping construction in (14).

(14) Sue: Jonathan could serve dinner.
Bill: Theresa couldn't [$_{VP}$ serve dinner $_{t}$] to her friends. (Orth and Yoshida 2025, p. 5)

In (14), the first clause *Jonathan could serve dinner* contains only the object DP *dinner*, with no beneficiary PP. The second clause *Theresa couldn't [serve dinner t] to her friends* is a case of Pseudogapping, where the verb *serve* and its internal argument *dinner* are elided, leaving the PP *to her friends* as the remnant. Crucially, the antecedent clause provides no overt PP correlate for *to her friends*, which therefore instantiates sprouting with a

PP remnant. Nevertheless, the sentence is judged acceptable. This shows that, unlike Verbal Gapping—which systematically rules out sprouting— Pseudogapping can tolerate sprouting with PP remnants under certain conditions.

The acceptability of (14) directly challenges Overfelt's (2024) size-based generalization, which predicts that all predicate ellipses should exclude sprouting. While Verbal Gapping conforms to this prediction, Pseudogapping does not: at least with PP remnants, sprouting is possible.

3.3 Experimental Evidence

Orth and Yoshida (2025) further confirmed these observations with an acceptability judgment experiment comparing Verbal Gapping and Pseudogapping under overt versus implicit arguments. Representative items are shown in (15)–(16).

(15) Verbal Gapping
a. Overt argument
Theresa served dinner to her father, and Ben to his mother.
b. Implicit argument (Sprouting)
*Theresa served dinner, and Ben to his mother.

(16) Pseudogapping
a. Overt argument
Theresa served dinner to her father, and Ben did to his mother.
b. Implicit argument (Sprouting)
Theresa served dinner, and Ben did to his mother.

The results revealed a significant interaction: while both structures showed a decline with implicit arguments, the reduction was substantially greater in Verbal Gapping than in Pseudogapping, indicating that Pseudogapping shows limited tolerance for sprouting with PP remnants.

3.4 Explaining the Divergence: ATB-Movement vs. VP-Ellipsis

Although both Verbal Gapping and Pseudogapping fall under the broader class of predicate ellipsis, they diverge in their tolerance of sprouting. Orth and Yoshida (2025) argue that this difference follows from the distinct derivational mechanisms involved: Verbal Gapping is derived via Across-the-Board (ATB) VP-movement, while Pseudogapping is derived via VP-ellipsis.

On the ATB-movement approach to Gapping (Johnson 2009), the derivation proceeds by moving a single VP simultaneously out of each conjunct in a coordination structure. In order for this movement to take place, the remnants and their correlates must first vacate the VP, leaving behind traces that are subsequently bound by the moved VP. As Orth and Yoshida (2025) emphasize, this requirement creates a structural dependency between the remnant in the second conjunct and an overt correlate in the first conjunct. When such a correlate is absent—as in sprouting configurations—the necessary vacating movement cannot occur. Implicit arguments, by definition, lack a syntactically projected position and therefore cannot undergo this movement or license the trace left by ATB-movement. The result is a violation of trace-binding requirements, which explains why sprouting is systematically ruled out in Verbal Gapping.

Pseudogapping, in contrast, does not involve ATB-movement. Instead, it is typically analyzed as derived from VP-ellipsis, with remnants surviving via focus movement or argument raising. Because the ellipsis is licensed by VP-deletion rather than ATB-movement, no vacating requirement is imposed on correlates, and no problematic trace-binding dependency arises.

3.5 DP vs. PP Remnants in Pseudogapping

One remaining issue concerns the category of the remnant. Example (17) illustrates that DP sprouting is not possible in Pseudogapping[1].

(17) a. Pam will read the article, but she won't read t the BOOK.
b. *Pam will read, but she won't read t the BOOK. (Orth and Yoshida 2025, p. 9)

In (17a), the remnant *the BOOK* has an overt DP correlate (*the article*) in the antecedent, so the structure is licensed. In (17b), by contrast, no such correlate is available, making *the BOOK* a sprouting DP remnant. The result is ungrammatical. What remains unexplained in current theory is precisely this: why DP sprouting is impossible in Pseudogapping**.** Overfelt (2024) rules out sprouting in Pseudogapping altogether, without distinguishing between DPs and PPs. Orth and Yoshida (2025) refine this picture by showing that PP sprouting can be tolerated, but their account does not extend to DPs, leaving the ungrammaticality of DP sprouting unaccounted for.

3.6 Interim Summary

The findings of Orth and Yoshida (2025) refine the picture of sprouting in predicate ellipses. Overfelt (2024) argued that sprouting is excluded from all predicate ellipses, but Orth and Yoshida show that this holds only for Verbal Gapping. Here sprouting is uniformly blocked, as predicted, since the ATB-movement derivation requires overt correlates. By contrast, Pseudogapping, derived from VP-ellipsis, allows sprouting with PP remnants. An acceptability judgment experiment confirmed this asymmetry: both structures declined with implicit arguments, but the reduction was markedly greater in Verbal Gapping, indicating that Pseudogapping shows limited tolerance for sprouting with PP remnants.

However, one crucial limitation remains. Orth and Yoshida (2025) focus on PP remnants, whereas the evidence shows that DP sprouting in Pseudogapping is systematically ungrammatical. This apparent DP/PP asymmetry is not yet fully explained and represents the critical open issue that necessitates the Case-theoretic proposal developed in Section 4.

4. Towards an Account

This section seeks an alternative Case-theoretical account for the impossibility of eliding a sub-clausal structure in Sprouting contexts containing implicit arguments in antecedent clauses, as observed by Overfelt (2024) and corroborated by Orth and Yoshida (2025).

[1] The examples in (16) correspond to Overfelt (2024, ex. 4c, 6c), where the second conjunct is presented without *read*. Orth and Yoshida (2025, p. 9) reproduce them with *read* included. Since the crucial factor is the presence or absence of an overt correlate, the realization of the verb is not considered significant.

4.1 Case and TP-ellipsis

Chung (2013) proposes the basic idea of limited syntactic identity for ellipsis as in (18), and implement it with the conditions in (19).

(18) Limited syntactic identity in sluicing (the basic idea) (Chung 2013, p. 29)
The interrogative phrase of the sluice must be integrated into a substructure of the syntax in the ellipsis site that is identical to the corresponding substructure of the antecedent clause.

(19) Limited syntactic identity (specifics) (Chung 2013, p. 30)
a. Argument structure condition: If the interrogative phrase is the argument of a predicate in the ellipsis site, that predicate must have an argument structure identical to that of the corresponding predicate in the antecedent.
b. Case condition: If the interrogative phrase is a DP, it must be Case-licensed in the ellipsis site by a head identical to the corresponding head in the antecedent clause.

Let us see what particularly the condition in (19b) is designed to capture. It has to do with the examples in (20), adopted from Chung (2013, p. 27); see also Merchant (2001, p. 22)

(20) a. Decorating for the holidays is easy if you know how <to decorate for the holidays>.
b. *Having to compromise is inevitable, but they have no idea who <to compromise>.

In (20a), a *to*-infinitive can be elided with a gerund as its antecedent, despite their morphological differences. This is possible because the wh-adjunct *how* does not require Case, allowing the Case condition to be vacuously satisfied. In contrast, (20b) is ungrammatical: here a finite TP is elided from a gerundive antecedent, and the wh-DP *who* requires Case licensing. Since the finite T in the ellipsis site has no matching counterpart in the gerund antecedent, Chung's (2013) Case condition is violated.

Chung's (2013) Case condition in (19b) raises a question about the licensing of the wh-phrase as an implicit argument correlate in Sprouting constructions as in (21).

(21) John ate, but I don't know what <he ate>.

Case-oriented syntactic identity requires that, when the remnant is a DP, it must be Case-licensed in the ellipsis site by a head identical to the corresponding head in the antecedent clause. Consequently, Sprouting-type sluicing poses a challenge for Case-oriented syntactic identity.

Chung (2013) resolves this problem in conjunction with the similar problem in Sprouting constructions of Chamorro as in (22).

(22) Mang-guaiya su Julia, lao ti hu tungu' håyi <ha guaiya>
AGR.AP UNM Julia but not AGR know who WH[OBJ].AGR love
'Julia loves (someone), but I don't know who <she loves>.'

In (22), sluicing involves a clause with the transitive form of *guaiya* 'love', whereas the antecedent verb appears in its antipassive (AP) form, created by attaching the prefix man-. The Chamorro antipassive thus corresponds to

English verbs with implicit arguments. Chung (2013) and Takita (2015), drawing on Baker (1988), propose that *man-* originates as a nominal complement that incorporates into the verb. Following Rothstein (1992), they argue that this incorporation fulfills Case-licensing, and that English implicit arguments undergo an analogous derivation.

4.2 Case and Sub-clausal Ellipsis

With the conditions on Case-oriented syntactic identity established in Section 4.1, we now apply this Case-theoretic framework to resolve the two major empirical contrasts discussed in Sections 2 and 3: 1) the general clausal vs. predicate ellipsis contrast, and 2) the specific DP vs. PP sprouting asymmetry observed in Pseudogapping. As noted in studies of movement out of elided VPs in English (Lasnik 1993, Merchant 2008, Schuyler 2001, among others), the scope of (c)overt movement for the correlate constituent in the antecedent clause corresponding to the remnant in the ellipsis clause is critical in licensing such movement. Lasnik (1993) notes that in antecedent-contained deletion with non-restrictive relatives, the moving direct wh-object can move out of the elided VP, but the object of a preposition cannot, as shown by the contrast between (23) and (24). Lasnik argues that both the wh-object and its correlate can utilize movement to [Spec, Agr-o] (in more recent terms, [Spec, v]), thereby meeting the parallelism between the antecedent and the ellipsis clauses. In a parallel fashion, what is raised to [Spec, Agr-o] in (25) is not the DP, but the PP for an EPP reason to satisfy the parallelism.

(23) ?Dulles DOES praise Philby, who he DID < praise $_t$> as well.
(24) *John stood near Mary, who BILL did <stand near $_t$> as well.
(25) ?John stood near Mary, near whom Bill did <stand> as well

The parallel raising of both the remnant and its correlate to [Spec, Agr-o] accounts for a range of cases of extraction from elided VPs, as documented in Merchant (2008: 140) and reproduced below.[2]

(26) a. I know what I LIKE and what I DON'T <like>.
b. I know which books she READ, and which she DIDN'T <~~read~~>.
c. What VP-ellipsis CAN do, and what it CAN'T <~~do~~>. (Johnson 2001)
(27) a. GREEK, you should take; DUTCH, you shouldn't <~~take~~>.
b. I know which books ABBY read, and which ones BEN did <~~read~~>.
(28) a. I think YOU should ride the TALLEST camel, but I don't know which one PHIL should <~~ride~~>. (Schuyler 2001, p. 48)
b. I think you SHOULD adopt one of these puppies, but I can't predict which one you actually WILL <~~adopt~~>. (Schuyler 2001, p. 49)
c. ABBY took GREEK, but I don't know what language BEN did <~~take~~>.

[2] Examples (i)–(iii) illustrate cases where movement out of elided VPs appears to be non-local rather than local, as documented by Merchant (2008: 140). Grano and Lasnik (2018) offer a principled explanation for why such seemingly non-local extractions are possible, accounting for their exceptional status.

(i). (I know) ABBY wants to take GREEK, but I don't know what language BEN does <~~want to take~~>.
(ii). ABBY$_1$ said she$_1$ took GREEK, but I don't remember what language BETH$_2$ did <~~say she$_2$ took~~>.
(iii). ABBY attended a lecture on KEATS, but I don't know what poet BEN did <~~attend a lecture on~~>.

d. We know that Abby DOES speak [Greek, Albanian, and Serbian]$_F$ -- we need to find out which languages she DOESN'T <~~speakt~~>! (Merchant 2001, p. 115 fn 5 (ii))

In all these examples, what is elided is a simple VP, out of which wh-extraction takes place.

Note that the remnant's correlate must move to the VP edge in order to supply the constituent that satisfies the identity condition on VP ellipsis. Without this movement, the constituent for the identity in VP ellipsis would be unnecessarily large (Lasnik and Park 2013). Since both the remnant and its correlate target [Spec,Agr-o/v] at the VP edge, their displacement constitutes a highly local form of A-movement. More concretely, when extraction occurs out of the VP, the identity in VP ellipsis is established through the parallel structure between the antecedent and the ellipsis clause, as shown in (28a–b).

(29) a. antecedent clause: [$_{TP}$ [Agr-o/v [$_{TP}$ its correlate]
↑__local A-movement_____|
b. ellipsis clause: [$_{TP}$ [Agr-o/v [$_{TP}$ the remnant]
↑___local A-movement_____|

We now come to (5) and (6), repeated as (29) and (30), and to (15b), repeated as (31):

(30) Clausal ellipses with sprouting
a. Sue will READ, but I forget what. (sluicing; Chung et al. 2011)
b. Q: Will Sue READ? – A: Yeah, the BOOK. (fragment answer; Weir 2014)
c. Sue will READ, but not the BOOK. (stripping; Nakao et al. 2012)

(31) Predicate ellipses with sprouting
a. *Pam will READ, but I forget what Sue will. (VP ellipsis)
b. *Pam will READ, and the BOOK Sue will. (VP ellipsis with contrastive topic)

(32) Theresa served dinner, and Ben did to his mother.

There is a grammatical contrast between clausal and sub-clausal (predicate) ellipsis when the sprouted remnants are DPs, as seen in (29) and (30). Furthermore, pseudogapping shows a contrast between sprouted DPs and PPs, as seen in (30) and (31).

These two contrasts follow from how Case-licensing applies to the implicit argument corresponding to the DP remnant. In the antecedent clause, this implicit argument is Case-licensed through incorporation into the selecting verb. As a result, it cannot move out of the containing VP, which prevents it from satisfying the identity condition on VP ellipsis. Although the implicit argument is confined to the VP, the corresponding remnant moves out of the elided VP. By contrast, in sluicing and stripping, the implicit argument can be bound by an existential operator merged at the TP edge, which takes propositional scope and thereby establishes scope parallelism with the remnant in these constructions.

Why does the contrast between sprouted PPs and DPs arise? Following Bruening (2021), we propose that, unlike DP implicit arguments, PP implicit arguments (with PP remnants) are generated not within the VP but in the projection of Appl(icative) outside the VP. Consequently, even though they do not move out of the VP, the VP remains available as the target of ellipsis, thereby satisfying the identity condition.

5. Conclusion

In this paper, we examined the distribution and licensing of sprouting across different types of ellipsis and considered its theoretical implications. Building on Overfelt (2024), we began with the observation that sprouting is licensed in clausal ellipses but excluded from predicate ellipses, due to distinct antecedent recovery mechanisms. Subsequent findings by Orth & Yoshida (2025) refined this picture. Their experimental results showed that predicate ellipses are not uniform: while Verbal Gapping systematically excludes sprouting, Pseudogapping displays a more permissive profile, allowing sprouting with PP remnants though still excluding DP remnants. This asymmetry highlights that the distribution of sprouting cannot be reduced to a simple clausal versus predicate distinction, but instead reflects finer-grained differences in the derivational mechanisms underlying each type of ellipsis.

To account for these contrasts, we advanced a Case-theoretical perspective. We argued that implicit DP arguments, which are Case-licensed via incorporation within the VP, cannot move out of the VP and therefore fail to meet the identity conditions required for VP-ellipsis. PP arguments, by contrast, originate outside the VP in an applicative projection, making the VP a viable ellipsis site and allowing PP sprouting under certain conditions. This approach captures both the unavailability of sprouting in DP contexts and the limited availability of sprouting in PP contexts of Pseudogapping.

Our Case-based account thus unifies previous findings by showing that sprouting in Pseudogapping is systematically constrained by the licensing of implicit arguments. Implicit DPs are Case-licensed inside VP through incorporation into the verb and therefore cannot move out, preventing them from satisfying the identity conditions for VP-ellipsis. This derives the unavailability of DP sprouting. PP arguments, by contrast, are introduced in an applicative projection outside VP, so the VP remains a legitimate ellipsis site, allowing PP sprouting under certain conditions. In this way, the analysis resolves the apparent tension in previous accounts and integrates both the clausal–predicate contrast and the finer DP–PP asymmetry. Future work should broaden the empirical base of PP sprouting through systematic experimental studies, allowing the Case-theoretic account to be further tested and refined.

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Examples in: English
Applicable Languages: English
Applicable Level: Tertiary

