

Chinese Relative Clauses as Reduced (Participial) Relative Clauses

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ABSTRACT: The two possible positions of relative clauses (RCs) in Chinese (the pre-demonstrative one and the post-demonstrative, post-numeral and post-classifier one: <RC1> – Demonstrative – Numeral – Classifier – <RC2> – AP- Noun) have, since Chao's (1968) characterization of RC1 as "restrictive" and RC2 as "descriptive" (nonrestrictive), made Chinese RCs appear quite different from the RCs of other languages (even in conflict with the standard semantics of restrictive and nonrestrictive RCs). A comparative perspective may make Chinese RCs appear less unique.

KEYWORDS: relative, clauses, Chinese, reduced, participial

Comparative Remarks

There is cross-linguistic evidence that finite nonrestrictive, finite restrictive, and (reduced) participial restrictive clauses (RCs) occupy different positions within the nominal extended projection, as shown in (1) (the "greater than" sign > stands for hierarchically higher):

$$(1) \text{RC}_{\text{finiteNon-Restr}} > \text{Dem} > \text{RC}_{\text{finiteRestr}} > \text{Num}_{\text{Card}} (\text{Clf}) > (\text{AP} >) \\ \text{RC}_{\text{participial}} > \text{AP} > \text{N}^1$$

First, in languages in which restrictives remain between the demonstrative and the noun nonrestrictives are invariably found outside demonstratives. This can be clearly seen in more rigid head-final and head-initial languages (in non-rigid head-initial, or head-medial, languages like English or Italian this cannot be seen as clearly²).

In more rigid head-final languages, like **Turkish** (see (3), from Bayırlı 2017, p. 85), **Korean** (see (4), from Kim 1997, p. 11; also see Kim 1993, p. 192), or

Japanese (see (5), from Kim 1997, p. 12; as well as Kameshima 1989, §4.3.3) the order is as in (2):³

- (2) **RC_{finiteNon-Restr} Dem RC_{finiteRestr} ... N**
- (3) a. Noam'in yazdığı o şiir (nonrestrictive)
 Noam-GEN write.REL that poem
 'that poem, which Noam wrote...'
- b. O Noam'in yazdığı şiir (restrictive)
 that Noam-GEN write.REL poem
 'that poem that Noam wrote..'
- (4) a. Peter-nun [DP_{RC} ton-i manh-un]
 [D **ku**] [NP yeca]]-lul cohahan-ta. (nonrestrictive)
 Peter-topic money-Nom many-AM that woman-Acc like-Dec
 'Peter likes that woman, who has a lot of money.'
- b. Peter-nun [DP [D **ku**] [RC ton-i manh-un]
 [NP yeca]]-lul cohahan-ta. (restrictive)
 Peter-topic that money-Nom many-AM woman-Acc like-Dec
 'Peter likes the woman who has a lot of money.'
- (5) a. [Watashi-ga katta] **ano** hon (nonrestrictive)
 I-Nom bought that book
 'That book, which I bought..'
- b. **Ano** [watashi-ga katta] hon (restrictive)
 that I-Nom bought book
 'the book that I bought..'

In more rigid head-initial languages, like **Vietnamese** (see (7), from Nguyen 2004, p. 61f)⁴ **Indonesian** (see (8), from Lehmann 1984, p. 282)⁵ and **Javanese** (Ishizuka 2008, §2),⁶ we find the mirror-image order in (6):

- (6) **N ... RC_{finiteRestr} Dem RC_{finiteNon-Restr}**
- (7) a. Tôi thích cái đầm [Dem **này**]
 [RC mà cô ấy chọn] (nonrestrictive)
 I like CLF dress this that aunt that choose
 'I like this dress, which auntie has chosen'
- b. Tôi thích cái đầm [RC mà cô ấy chọn] [Dem này] (restrictive)
 I like CLF dress that aunt that choose this
 'I like the dress that the aunt has chosen'
- (8) a. lelaki [Dem **itu**] [RC yang sedang tidur] (nonrestrictive)
 man that REL Prog sleep
 'That man, who is sleeping...'

- b. lelaki [_{RC} yang sedang tidur] [_{Dem} itu] (restrictive)
 man Rel Prog sleep that
 ‘The man that is sleeping.’

Finite restrictives, as again apparent from the more rigid head-final and head-initial languages, are sandwiched between demonstratives and cardinal numerals. See (9) and (10):

More rigid head-final languages:

- (9) a. **Dem** **RC_{finiteRestr}** **Num_{Card}** **A** **N**
 b. **Amharic** (Ethio-Semitic, SOV - Beermann & Ephrem, 2007, p. 26)⁷
 [ennäzza [yayyāhuaccāw] sost teleleq weshocc]
 those that.I.saw three big dogs
 ‘Those three big dogs that I saw’
 c. **Wolaytta** (West Cushitic, SOV - Lamberti & Sottile, 1997, p. 215)
 [he [taa- w kuttuwa ehida] iccashu adussa laagge-t-I]
 those me-dat chicken that.brought five tall friend-PL-NOM
 ‘those five tall friends who brought me a chicken’

More rigid head-initial languages:

- (10) a. **N** **A** **Num_{Card}** **RC_{finiteRestr}** **Dem**
 b. **Tukang Besi** (Malayo-Polynesian, VOS – Donohue, 1999, p. 307, adapted from (20))
 [na wowine mandawulu dua-mia [umala te pandola]_{RC}
 [meatu’e ai]_{Dem}]_{KP}
 NOM woman beautiful two-CLF [fetch.SI art eggplant] REF-that
 ANA
 ‘those two beautiful women who were bringing eggplants’
 c. **Lango** (Eastern Nilotic, VSO – Noonan, 1992, p. 156)
 gwóggí à dòṅò àryó [ámé lóca ònèkò]-nì
 dogs ATT big two [Rel-Part man 3sg.kill.Perf]-this
 ‘These two big dogs that the man killed’

This accords with the semantics. Nonrestrictives modify something with independent reference, DP/DemP, and are thus outside the scope of DP/DemP; restrictives are instead within the scope of the determiner, which expresses the uniqueness or maximality of the intersection between the set of entities contributed by the Head and the set of entities contributed by the relative clause.

As to participial RCs, they appear instead to be preferentially merged below cardinal numerals (and above direct modification adjectives). See (11) to (13), and Cinque (2010, §4.2) and Cinque (2020, §3.5), for a more detailed discussion:

English (Tim Stowell, p.c.):

- (11) a. These two **recently appointed** professors are quite nice.
 b. ?*These **recently appointed** two professors are quite nice.

Bulgarian (Iliyana Krapova, p.c.)

- (12) a. tezi **trima** [naskoro pristignali] bivši poslanici ot Chili
 these three recently arrived former ambassadors of Chile
 b. ?*tezi [naskoro pristignali] **trima** bivši poslanici ot Chili
 these recently arrived three former ambassadors of Chile

German (Walter Schweikert, p.c.):

- (13) a. diese drei [in ihren Büros arbeitenden] Männer
 these three in their office working men
 ‘these three men working in their office’
 b. ?*diese [in ihren Büros arbeitenden] drei Männer
 these in their office working three men

Chinese RCs

Consider now Chinese pre-demonstrative and post-demonstrative RCs as characterized in Chao’s (1968) classical work. On page 286 he states that the pre-demonstrative position of the RC generally triggers a restrictive interpretation ((14)a), while a post-demonstrative one typically receives a “descriptive” (nonrestrictive) one ((14)b):

- (14) a. [**Dai yanjing de**] na wei xiansheng shi shei? (restrictive)
wear glasses DE that-CL gentleman is who
 ‘Who is the gentleman who is wearing glasses (not the one who is not wearing glasses)?’
 b. Na wei [**dai yanjing de**] xiansheng shi shei? (‘descriptive’
 (nonrestrictive))
 that-CL **wear glasses DE** gentleman is who
 ‘Who is that gentleman (who incidentally is) wearing glasses?’

Chao also adds, “if a contrasting stress is placed on a modifier, it is used restrictively, so that if *dai yanjing* in [(14)b.] is contrastively stressed, the sentence will have the same restrictive sense as in [(14)a.]”. Also see Huang (1982, p. 68ff).⁸

In this overall scenario, Chinese is puzzling on three counts.⁹ **First**, post-demonstrative RCs (RC2) appear below cardinal numerals (and classifiers) rather than above them (as is the case with finite restrictives – see (9) and (10) above);¹⁰ **second**, pre-demonstrative RCs are typically restrictive rather than, as one should

expect, nonrestrictive (see (3), (4), and (5) above)¹¹; and **third**, which is the most puzzling property, the post-demonstrative, post-numeral, post-classifier position of the RC is apparently open to a nonrestrictive interpretation (the second and third points appear in conflict with the semantics of restrictives and nonrestrictives – cf. Lin 2004, §§4 and 5; Constant 2011, §1.1).

These three puzzles would disappear if we were to analyze Chinese RCs as participial (or reduced, nonfinite) RCs, as in many head-final languages. After all the finite/nonfinite distinction is not overtly marked in Chinese, so RCs might well be nonfinite.¹² This would plausibly mean taking RC2 as the base position, and RC1 as derived from it by movement.

There may in fact be some evidence for this conclusion (which I nonetheless advance tentatively).

The pre-demonstrative position of RCs (and that of other modifiers) appears to be a marked focus position, a fact noted in many works (Chao, 1968, p. 286; Paris, 1977, §3.2; L. Zhang, 2007, §5.1). The markedness of this position seems confirmed by the counts reported in Ming (2010, §4) and Hsu (2017, 75), where post-demonstrative RCs appear in corpora to be much more frequent than pre-demonstrative ones. See, for example, (15) from Hsu (2017, p. 75):

(15) Corpus	RC1	RC2	
Academia Sinica Balanced Corpus	21%	79%	(415 sentences)
Lancaster Corpus of Modern Chinese	28%	72%	(198 sentences)

Both facts thus seem to indicate that RC2 is more basic and that RC1 is more marked (Hsu 2017, p. 74), also because RC1 displays various restrictions not found with RC2 (N. Zhang, 2015, p. 375).¹³ In fact, many have argued that the pre-demonstrative RC is derived from the post-demonstrative (and post-Num Clf) one. See Aoun and Li (2003, p. 253, n. 21), Lin (2008, §5), and N. Zhang (2015, §3), among others.

Thus, let's disregard the derived pre-demonstrative position and consider only RC2, the more basic post-demonstrative, post-numeral, and post-classifier option, attempting to show that it shares properties with the participial RCs of English and Romance.

In addition to its position below numerals, there are four more properties Chinese RC2s appear to share with English (Germanic) and Italian (Romance) participial RCs rather than with their finite restrictives.

1) A Chinese RC2 can be interpreted either nonrestrictively or restrictively, as noted above. This makes them similar to English post-numeral participial RCs, which can be either nonrestrictive (see (16)) or restrictive (see (17)) even if the nonrestrictive interpretation (like that of nonrestrictive adjectives: *her poor*

father) should be kept distinct from that of English (or Romance) finite nonrestrictives, which modify a DP/DemP with independent reference (see Cinque 2010, p. 52ff). An English nonrestrictive participial RC and a Chinese RC2 interpreted nonrestrictively seem to express an inherent property of the NP, modifying something that is still a predicate.¹⁴

- (16) a. Her *recently deceased* father¹⁵
 b. The *recently deceased* John Jones was a friend of mine.

- (17) I only met the *newly appointed* colleague, not the others.

2) When two RCs are stacked the RC with a stage-level interpretation has to precede the RC with an individual-level interpretation (as is the case with Turkish participial RCs – Jaklin Kornfilt, p.c. – and unlike what happens with finite RCs in English). Del Gobbo (2005, §3) and Larson and Takahashi (2007, §2.3) (pace Aoun & Li 2003, p. 150) note that Chinese RCs expressing generic, individual-level properties must occur closer to the noun than those expressing episodic, temporally anchored, stage-level properties. See (18), from Huang (2016, p. 443), adapted from examples given in Del Gobbo (2005, §3.2).¹⁶

- (18) a. [_{RC} wo zuotian kanjian de] [_{RC} xihuan yinyue de] ren
 I yesterday saw DE like music DE person
 ‘the person who likes music who I saw yesterday’
 b.*[_{RC} xihuan yinyue de] [_{RC} wo zuotian kanjian de] ren
 like music DE I yesterday saw DE person

According to Larson and Takahashi (2007, §1), this restriction is found with the order between two English attributive modifiers ((19)) but not with the order between two finite restrictives ((20)):

- (19) the **Thursday** **Thursday** lecture
stage-level individual-level
**individual-level stage-level*

- (20) a. the person [**who smokes**] [**who I met**]
 b. the person [**who I met**] [**who smokes**]

Larson and Takahashi do not discuss English participial RCs, but to judge from Italian, they seem to behave similarly, with individual-level RCs closer to N than stage-level ones:

- (21) a. Le uniche disposizioni [**riguardantici**][**pervenute**] sono queste.
 The only dispositions [**concerning us**] [**received by us**] are these.
 b.*?Le uniche disposizioni [**pervenute**][**riguardantici**] sono queste.¹⁷

3) Another property Chinese RCs share with Italian and English participial reduced RCs rather than with their finite RCs concerns the unavailability of the reconstruction of numerals inside the RC. Chinese RCs show anaphor and pronominal binding reconstruction (see (22a–b), from Aoun & Li, 2003, pp. 132–133), though apparently not reconstruction of numerals under the scope of a RC internal quantifier (see (23), from Aoun & Li, 2003, p. 133). Aoun and Li (2003) suggest that the latter property is related to the possibility in Chinese to reconstruct NPs but not DPs. I take this to be a consequence of the Merge position of Chinese pre-nominal RCs, which is below not only strong determiners (as we should expect for restrictives) but also below cardinal numerals (and classifiers), much like the participial RCs of Italian (Romance) and English (Germanic)¹⁸: Dem Num CLF RC N, which is one of the canonical orders of Chinese RCs, the alternative one (RC Dem Num CLF N) being arguably derived by movement (as discussed above). This implies that the external Head (and the internal one, which reconstructs in “raising” derivations) is only constituted by [AP N]). In other words, Aoun and Li’s observation concerning the non-reconstruction of numerals in Chinese may be a consequence of the position in which RCs enter in the language (below numerals). If numerals are above the merge position of the RC, alongside all of Milsark’s (1974) strong determiners, it is expected that they do not reconstruct inside the RC just as the strong positive and negative universal determiners (“all,” “no,” etc.) do not reconstruct (*No/All books that I read dealt with this problem* $\neq$ ‘I read no/all books’).

- (22) a. [[wo jiao zhangsan quan mei-ge-ren_i kai t lai de] ziji_i de chezi lai..
I ask Zhangsan persuade every-CL-person drive come DE self DE car
‘The self’s car that I asked Zhangsan to persuade everyone to drive over..’
- b. ni hui kandao [[wo xiwang mei-ge xuesheng_i dou neng dai t lai de] wo gei ta_i de shu].
you will see I hope every-CL student all can bring come DE I give his book
‘You will see the book that I gave to him_i that I hope every student_i will bring.’
- (23) wo hui zhengli [[mei-ge-ren dou hui kan t DE] san-ben shu].
I will arrange [[every-CL-person all will read de] three-CL book] (same 3 books)
‘I will put the three books that everyone will read in order.’

In Italian and in English, participial reduced RC (unlike their finite restrictives) do not allow a numeral to reconstruct under the scope of a universal quantifier like “all.” See (24)a and (24)b:

- (24) a. I due problemi assegnati a tutti gli studenti erano sbagliati. (2 > 'all';
*all' > 2)
'The two problems assigned to all the students were wrong.'
b. The two books read by all the students were about warfare. (2 > all;
*all > 2)¹⁹

4) Chinese RC2 can also occur closer to the N than adjectives (see (25), from Victor Pan, p.c.) (pace Lu, 1998).²⁰ They share this property with the participial RCs of English ((26)a.), German ((26)b.), and Finnish ((26)c.) (also see Cinque, 2010, pp. 121 and 131), but not with English finite restrictives (see (27), from Steven Franks, p.c.):

- (25) na-zuo [pojiu-de] [renmen zao yi yiqi de] simiao
that-CL old-DE people early already abandon DE] temple
'the old temple that people has already abandoned'
- (26) a. that [beautiful] [recently arrived] letter (English – Kayne, 2005,
p. 66)
b. [kleine] [unter dem Strassenniveau liegende] Läden (German - Kafka
Der Proceß)
small under the street-level lying stores
'small stores that lie below the level of the street'
c. nämä kolme [komeaa] [toimstossaan työskentelevää] miestä
(Finnish)
these three fascinating office.INESS working men
'these three fascinating men working in the office' (Lena Dal Pozzo,
p.c.)
- (27) a. ?Mary tried to interview every candidate possible that she liked (N AP
RC_{finiteRestr})
b. *Mary tried to interview every candidate (that) she liked possible
(N RC_{finiteRestr} AP)

Two Possible Difficulties for the Analysis of Chinese RCs as (Reduced) Participial/Nonfinite RCs

1) Chinese RCs, differently from English, German, Italian, and other nonfinite participial RCs, can have an overt subject (suggesting that some Case is assigned to it).²¹ Thinking of Karata (Northeast Caucasian) and of T'in (Mon-Khmer) RCs, which as in Chinese are participial and occur below numerals and yet license an overt subject (see (28)), the participial nature of Chinese RCs could perhaps still be upheld.²²

- (28) a. hab k'eda [dena raxw-araj] č'ikororaj igruška-bdi..(Karata – Testelec, 1998, p. 277)

this two [I bring-PRT] nice toy-PL..
'these two nice toys which I had brought...'

- b. siŋ [bakeew thoon] piaŋ naŋ ?eən pəl (T'in – Filbeck, 1976, p. 287)²³
pig [Kaew buy] two clf that die
'those two pigs which Mr.Kaew bought died'

2) More serious would seem to be the unbounded nature of Chinese RCs (see (29a)) and their sensitivity to islands (see (29b)) (Ning, 1993, §2.3; Li, 2002, §3.1.1; Aoun & Li, 2003, §6.3) versus the bounded nature of English and Romance participial RCs. But once again this might not be too different from the parametric difference between English and Italian (Romance) in the nonfinite *easy-to-please* construction (unbounded and subject to islands in English ((30)a.-b.) but bounded in Italian ((31)) (also see n. 20):

- (29) a. zhe jiu shi [[ta renwei [ni yinggai t_i zuo zhejian shi de]] fangfa_i] (Aoun & Li, 2003, p. 177)

'This is the way that he thinks you should do this work.'

- b. *zhe jiu shi [[[[ta xihuan [t_i zuo zhejian shi] de] ren] de] fangfa_i] (Aoun & Li, 2003, p. 177)

'This is the way that he likes the person that does the work.'

- (30) a. That book_i was not easy [Op_i to persuade Bill [to read t_i]]

- b.*John_i is easy [Op_i to describe to Bill [a plan [to assassinate t_i]]] (Chomsky, 1977, p. 104)

- (31) a. Quel libro non è stato facile [da leggere t]

That book was not easy to read

- b. *Quel libro non è stato facile [da convincere Bill [a leggere t]]

That book was not easy [to persuade Bill [to read t]]

All in all, then, the nonfinite, participial nature of Chinese RCs could still prove to be real.

Conclusion

This article has provided a comparative perspective on Chinese relative clauses (RCs), trying to show that by analyzing Chinese RCs as reduced participial (non-finite) RC, one can make sense of, and dissolve, the three puzzles noted above,

which made Chinese RCs appear to be very unusual vis-à-vis the RCs of other languages.

Notes

1. For a more detailed discussion, see Cinque (2019). I abstract away here, as not relevant, from the distinction that must be made between two types of nonrestrictive RCs in head-initial languages with post-nominal RCs (see Cinque, 2008).
2. See Cinque (2020) for a discussion. An early proposal for a higher attachment of nonrestrictive RCs is Jackendoff (1977, §7.1), based on the relative position of (English) finite restrictive and nonrestrictive RCs when they co-occur (with the former closer to the Head than the latter).
3. According to Kameshima (1989, §4.3.3), Japanese restrictives can also appear in pre-demonstrative position, after the non-restrictive ones: RC_{finiteNon-Restr} RC_{finiteRestr} Dem Num A N.
4. “When the RC precedes the demonstrative, the RC restricts the meaning of the noun; when the RC follows the demonstrative, the phrase has a non-restrictive meaning” (Nguyen, 2004, 61f).
5. “[8](b) ist restriktiv, [8](a) appositiv” (Lehmann, 1984, p. 284).
6. “the *sing* RC preceding a demonstrative is a restrictive RC, whereas the *sing* RC following a demonstrative is a non-restrictive RC” (Ishizuka, 2008, §2).
7. The same is true of the SOV Iranian language Sarikoli (Kim, 2017, §2.3).
8. For Lin (2004, §2.1) no focus is really needed for RC2 to be interpreted restrictively. For a similar, early, position see Teng (1981, p. 14) (as pointed out to me by Waltraud Paul).
9. In addition to the extremely rare combination of pre-nominal RCs and VO order, typical of Sinitic, except for Hui’an (Southern Min) and Kaiping (Yue) that “have what seem to be head-initial relatives” (Arcodia, 2017, p. 41).
10. The position between the demonstrative and the numeral, apparently possible for some speakers (Lu, 1998, §5.1; Aoun & Li, 2003, 146) is felt by many as unnatural (see Lin, 2008, fn. 5; Huang et al., 2009, p. 215; Zhang, 2015, fn. 1) and is generally not discussed in any detail. So I leave it to the side here.
11. They can, however, also be interpreted non-restrictively, under certain conditions. See, for example, (i):
(i) Wo mei zema [laoshishuo biao xian hen cha de] nage xuesheng. (Lin & Tsai, 2015, p. 113)
I have.not scold frankly-speaking perform very poor DE that student
‘I did not scold that student, who, frankly speaking, performed very poorly.’
12. *Hui*, which can appear within RCs, is occasionally claimed to be a future tense marker. But this is dubious as it can co-occur with a past time adverb like *zuotian* ‘yesterday’. See (i), from Hsieh (2002, p. 15)
(i) Wo qiantian zai dianshi li kandao zuotian taifeng hui lai de baodao
I the:day:before:yesterday in TV inside see yesterday typhoon will come DE report
‘I saw on TV the day before yesterday the report that the typhoon would come yesterday.’

Thus it is no finite deictic future tense but plausibly only a relative tense or prospective aspect ‘be going to/be about to’. Also see Hsiao (2003): “Verbs are generally not overtly marked for tense in Chinese”.

13. There are also certain syntactic differences between pre- and post-demonstrative RCs; for example the fact that only pre-demonstrative RCs can drop the subordinator *de* (cf. among others Wu, 2009, §2), that only the post-demonstrative RC *de* can license topicalization and ellipsis (Zhang, 2013, p. 242; 2015, §2.5; Lin & Tsai, 2015, 114ff), and that only post-numeral RCs are possible in existential sentences (Huang, 1982, p. 64). For additional differences see Li (1984, Chapter IV) and L. Zhang (2007, Chapter 3).
14. Cf. Huang (1982, 103, fn30). There is a particular restriction on non-restrictive RCs in Chinese (clearer when they modify a proper name). They are felicitous if they describe a more or less stable property of the Head (an individual-level property). See Lin’s (2004) *Condition on Chinese Non-restrictive Relatives* (39).
15. Del Gobbo (2017, §6) also notes that English participial RCs can be non-restrictive.
16. Lin (2008) shows that the same relative order of stage-level RCs preceding individual-level RCs holds in pre-demonstrative position (as a consequence, I take, of Krapova and Cinque’s (2008) extension of Rizzi’s (1990) Relativized Minimality, which ensures preservation of order under movement).
17. The order restriction is in fact “lifted if a substantial pause is inserted between the two relative clauses.”, as Larson and Takahashi (2007, fn.2) note for Japanese.
18. See *I tre problemi assegnati per sbaglio ad ogni studente saranno ritirati*. ‘The three problems assigned by mistake to every student will be withdrawn.’ (3 > every; *every > 3). If the participle is followed by no adjunct the second reading becomes marginal (perhaps because *?gli assegnati tre problemi* ‘the assigned three problems’ is better than **Gli assegnati per baglio tre problemi*. ‘the assigned by mistake three problems’).
19. Thanks to Richard Kayne for the relevant judgment.
20. Lu (1998, p. 54) gives the following contrast. Yangyu Sun, p.c., reports that for her (i)b becomes possible if there is a pause between [lan de] and [Cyril du-guo de]:
 - (i) a. Susumu de san-ben [Cyril du-guo de] [lan de] shu
 Susumu DE three-CL Cyril read-Perf DE blue DE book
 ‘Sam’s three blue books that Cyril read’
 - b. *?Susumu de san-ben [lan de] [Cyril du-guo de] shu
21. If assigned by (silent) Tense (cf. Paul, 2018a, b) the overt subject would be Nominative; if assigned by a (nominal) participle, as in many head-final and head-initial languages (Krause, 2001), it would be Genitive.
22. Cf. Krause (2001, 14f) on languages that have non-finite ‘reduced’ RCs with genitive subjects permitting non-subject and non-local relativization. Zhang (2018, 28f) in fact claims that it is the complementizer DE, which can function as the English complementizer *for* of non-finite clauses, that licenses the Case of the overt subject in Chinese relative clauses.
23. In T’ in “An adjective modifying a head noun of a Noun Phrase, occurs positionally before the relative clause [..]
 - (i) ?iaɪ. kluak bakεεw thoon p.l
 chicken white Kaew buy die
 ‘The white chicken which Mr. Kaew bought died’” (Filbeck, 1976, p. 2)

Acknowledgments

Part of this work was presented at the 10th International Conference of the European Association of Chinese Linguistics (EACL-10), held at the University of Milan on September 28–29, 2018. The author wishes to thank Jim Huang, Jo-wang Lin, Victor Pan, Waltraud Paul, and Niina Ning Zhang for their feedback at the conference on some of the issues raised here. A previous version of this article appeared in Dun Deng, ed., *Tsinghua Linguistics*. Beijing: The Commercial Press (2022). The present version contains several additional observations and has benefitted from the comments of an anonymous referee.

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