

## Syntactic Analysis of the Notion of Case in Tyáp

**Rebecca Solomon Wakili<sup>1</sup>**

Department of Language and Communication Education<sup>1</sup>  
Kaduna State College of Education, Gidan Waya,  
Kaduna State, Nigeria.

**Olabisi Bamidele Sanni<sup>2</sup>**

Department of English<sup>2</sup>  
Kaduna State College of Education, Gidan Waya  
Kaduna State, Nigeria.

And

**Thomas Ogah Ashikeni<sup>3</sup>**

Department of Languages and Linguistics<sup>3</sup>  
Nasarawa State University, Keffi,  
Nasarawa State, Nigeria.

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### Abstract

This research centers on the role of case as grammatical aspect of Tyáp. Case allows for nouns and pronouns to be marked for their roles in the relationship they have with other parts of the sentence, such as the subject of INFL, object of a verb or a preposition. In many languages it is the primary way to distinguish the function of a noun within the sentence. The absence of any syntactic analysis of Tyáp on case making in Tyáp leaves a gap in the linguistic study of the language. This study employed case theory as the theoretical framework to analyze the case roles in Tyáp. The data for this research was gathered through oral interviews, observations and the native speaker intuition. The data for this study was analyzed using the descriptive method of data analysis which entails using analysis of forms produced by native speakers. For the presentation of data, the Leipzig word glossing rules was adopted. These were empirically controlled in order to identify the patterns of case obtainable in the language. This work adds to Tyáp linguistics data by providing information on the role of case, and how it can be applied in the language. Based on the findings, it is obvious that, Tyáp attests to four case forms which include nominative which is the subject of a sentence, accusative is the direct object of the verb, the oblique case for the object of the reposition and genitive case for possessive relation. This work contributes to the preservation of Tyáp language by providing a source of reference for further researches on the language. It will also provide an insight for other researchers who are interested in working on the language.

**Keywords:** Tyáp, Case, Nominative, Accusative, Genitive

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### Introduction

Case is the relationship between the verb and its argument which is better accounted for in terms of case role (Anagbogu 1990:34). Imoh, Yusuf and Gambo (2014:134) define case as a “noun or pronoun that shows relation to other words in a

sentence”. Case is a grammatical property that occurs in many languages, and indicates the grammatical relation (or grammatical function) of an NP in a phrase or sentence. Case marking, for example, determines whether a noun phrase is a subject, an object of a verb or a preposition; it

denotes the relationship the NP has with the verb and other case assigning element. The case forms of a pronoun are the different forms which the pronoun has in different sentence positions. In this paper we investigate case marking in Tyáp and the roles of various case assigners as obtainable in the language.

Tyáp belongs to the Katab (Tyáp) cluster of the South-Central subgroup of the Central group of Platoid languages, a division of the Benue-Congo family of the Niger-Congo phylum. Tyáp is spoken in the southern part of Kaduna State in Zangon Kataf Local Government Area. Although other researchers have attempted a study of the grammar of Tyáp such as Kafang (1983, 1987), who focused on Kataf (Tyáp) alphabets and provided notes on Tyáp orthography, grammar and key terms; Follingstad (1990, 1991a, 1991b) wrote on Tyáp verbs and did a phonological sketch of Tyáp; Akut (1990) and Follingstad (1991) worked on Tyáp noun phrase; Dimos, (1991) worked on the phonology and noun classification system in Tyáp; Byat (2013) did a contrastive analysis of English and Tyáp lexical patterns with teaching implication; Sanni (2020) worked on pluralization strategies in Tyáp; Wakili, Umaru & Imoh (2022) worked on the morphological and arithmetic processes of Tyáp numerals system; and Sanni, Imoh and Umaru (2022) worked on negation marking in Tyáp; thus far, there has been no research focused on case marking in Tyáp. This research will therefore study the various types of cases obtainable in the language, case assigners and their functions.

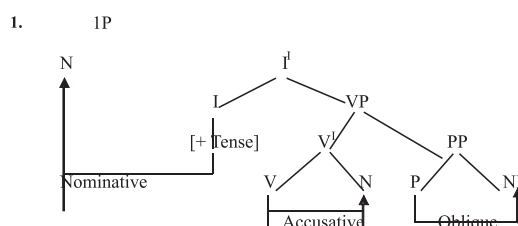
### Methodology

The primary data for this research was sourced through interviews and observation of native speakers of Tyáp. Also, native-speaker competence of one of the researchers in the language proved useful for the effective analysis of gathered data in the course of this research. Standard instruments such as Blench (2012)'s 1017 wordlist and Bernard and Smith (1977)'s *Lingua Descriptive Questionnaire* (Reference Grammar) which provided operational definitions were used for the gathering and interpretation of needed data. The research population for the study comprises both male and female native speakers of Tyáp within the age bracket of 30 to 70 years

who provided data that cuts across different age groups and gender. These native speakers were of A\_gbaád (Jej and Akpaise), A\_shokwa and Minyam (Ashon and Afakan) descent which constitute the three dialects found in the areas that make up the *Abin-Atyáp* 'land of Atyáp' including Zango town all found in Zango Kataf Local Government Area of Kaduna State. All language helpers for this research are multilingual as they all speak, read and write English, Hausa, and Tyáp. As the primary source of data, the selection of such multilingual informants is based on their ability to understand terms and expressions in English and to adequately and accurately translate these into their Tyáp equivalents which enhanced the effective interpretation and analysis of data gathered. The data collected was analyzed using the descriptive method of data analysis, that is, the analysis of forms produced by native speakers, and other language helpers. Liepzig glossing rules (morpheme by morpheme glossing) was used. This was empirically controlled in order to identify the types of cases obtainable in the language.

### Conceptual/Theoretical Framework

The theoretical framework adopted for this research is case theory. Case theory as an aspect of Government and Binding has to do with assignment of abstract case and its morphological development or realization. It is related to government, which deals with the relation between the head of a construction and its dependent categories. Chomsky (1981, 1982), posits that case is assigned under government based on a structural relationship existing between two different positions. This is because the choice of case for a given NP is determined by its governor. As such under GB, there can be no case assignment without government, so that ungoverned positions cannot be case marked. Based on this, the basic picture for case assignment under government is thus:



(Culled from Horrocks (1987))

In the configuration above, a [+ tense] INFL assigns nominative case to the subject NP. The verb and the preposition assign accusative and oblique cases to their objects respectively. For effective case assignment, there is a need for strict adjacency between the case assigner and the assignee. This is a necessary condition for grammatical case assignment. Grammatical case is assigned by lexical items, which are specified as (+v, +p, -N). Chomsky (1981, 1982) also asserts that case can be structurally or inherently assigned.

Radford (1998) claims that personal pronouns inflect overtly for the three traditionally acceptable cases in English, which are nominative, objective and genitive, with noun expressions inflecting only for genitive case. Fillmore (1968:80, 82) thus agrees that the surface case forms of NPs are most elaborately developed in personal pronouns and that “the study of ‘case’ as aspects of pronoun systems reveals a great deal about the variety of relationship that can hold between deep and surface cases”. He further posits that there are many ways in which cases and case environments are involved in determining the case forms of NPs such as:

- i. Whether the given NP has been chosen as subject in languages having subjectivalization processes.
- ii. Whether the choice of subject has the effect of determining number concord (on those verbal and auxiliary elements capable of reflecting number concord).
- iii. Whether the choice of subject might involve the modification of the verb to its passive or necessitate the introduction of an auxiliary.
- iv. Whether languages which incorporate pronominal affixes into the verb may do so for more than one NP at a time, and
- v. Whether noun stems themselves from particular cases may be incorporated into the verbal expression.

The obligatoriness of case as a feature on NPs hinges on the fact that whether case is morphologically marked or not, an overt nominal element is assigned case by virtue of its position in a sentence (Ndimele 1992). In essence, if an overt NP fails to be assigned case or fails to appear in a position to which case can be assigned, then the

structure becomes grammatically ill-formed. Blake (1994:1) affirms that case is the variations in the form of noun relative to argument structure. Case is usually marked by inflecting the head of the NP, which is always a noun or a pronoun (O’Grady, Dobrovolsky and Katamba (1996:260). O’Grady, et al (1996) points out that a somewhat richer system of contrast is found in English pronoun whose forms reflect a three-way case distinction which they exemplify as follows:

a. Case form for 3<sup>rd</sup> person singular masculine pronoun in English

Form	Name	Function	Example
He	nominative	subject	he left
His	genitive	specifier of NP	his book
Him	accusative	complement of NP	Mary saw him

Radford (1997) adds that, personal pronouns typically inflect overtly for all three cases; whereas noun expressions inflect only for Genitive case. The different case forms of typical pronouns and nouns are provided below:

b. Nominative - I we you he she it they who John  
 Objective - me us you him her it them whom(m) John  
 Genitive - my our your his her its theirs whose John’s  
 (Radford 1997:496)

Ndimele (1992:20) explains this to mean that “any sentence containing an overt NP (i.e. an \*NP that has phonetic content and visible to case) is ill-formed if the NP is not case-marked.” As such, the ability to have or not to have case depends on the phonological content of a category. Since all overt (i.e. lexical phonetically realized) NPs must have case, then the subject position of an infinitive (tenseless verb) is not a position to which case can be assigned because it cannot contain a lexical NP as well as PRO (which is an empty category). This accounts for the NP-to-VP Filter which prohibits subjects of infinitives. Riemsdijk and Williams (1986:228) recognize that such a subject position is not associated with a case-assigner “which is the single item in the environment of a given NP that licenses (validates the appearance of) the case in question”.

On the various case-roles assigned to NPs, Fillmore (1968:24) attempts the definition of the

various case roles as:

<i>Case</i>	<i>Case Roles</i>
a. Agentive Case	- animate instigator of an action
b. Instrumental Case	- inanimate force or object casually involved in an action or state
c. Dative Case	- identifies the affected animate being
d. Factitive Case	- the case of the object or being resulting from an action or state
e. Locative Case	- identifies the location or spatial orientation of an action or state
f. Phrase Objective case	- neutral case limited to things which are affected by the action or state identified by the verb

Case requirement is responsible for NP-Movements which take place from non-case-marked positions to case marked positions when NPs cannot receive case in their base-generated positions. To check such, Chomsky (1981:49) proffers the following filter to moderate the assignment of case:

\*NP, where NP has no case

A language can neutralize case distinctions by having no distinctive word endings that reflect the different cases and still have Case Filter. Since the case of such NPs is not morphologically realized, they can be referred to as *abstract* case. Abstract case is simply case with case distinctions morphologically neutralized and which functions much as does the regular case within the umbrella of Case Theory (Riemsdjik and Williams 1986). Uwalaka (1988) concedes that arguments in a sentence are associated with certain specific semantic case roles but disagrees with Fillmore's theory on the principles for identifying these case roles. He maintains that there is a need for a procedure that should either replace or supplement inherent native intuition in the identification of case roles.

### Empirical Review

Fillmore (1968:89) asserts that “every language, one can be sure has nouns which express concepts that are inherently relational” and as such presents the genitive case as the inherent case which is

determined at the deep structure level since it involves a thematic relation between the assigner and the assignee. Fillmore (1968:85) also makes reference to languages with person-marker incorporation based on optional absence of NP constituents which can be described as languages with appositional relations between NPs and verbs. He thus asserts that, “when there is an understood NP to deal with, some languages replace it by a pronoun while others get rid of it based on language typology”, thus claiming that in languages without pronominal incorporation, a distinction is made by some scholars between true subject/predicate languages and those in which so-called subject is as much a complement to the verb as is the direct object or any of the various adverbial elements.

Reporting on morphological and syntactic case-marking to express the nominative and accusative case form in Niger-Congo languages, Givon (2016:2-3) presents examples in a number of languages in the following examples:

2. i. *wó lá shnaknu ba-ya* (Gwari)  
3SG.NOM took pot.ACC broke  
'S/he broke the pot.'
- ii. *a ko neak ùza* (Bamileke)  
3SG.NOM take seek food.ACC  
'S/he is looking for food.'
- iii. *u lá duku la* (Nupe)  
3SG.NOM took pot.ACC break  
'S/he broke the pot.'
- iv. *Bola mú Adè wá* (Yoruba)  
Bola.NOM took Ade.ACC come  
'Bola brought Ade.'
- v. *Adè gbà ajá la* (Yoruba)  
Ade.NOM got dog.ACC save  
'Ade saved the dog.'
- vi. [e] *mén okpógoro óko di* (Efik)  
PRO take table.ACC that come  
'Bring that table.'

(Culled from Givon (2016:2-3))

In all the examples in (2i-vi) above, all the NPs are

assigned case, both nominative and accusative cases, with the exception being the empty category PRO in the subject position in example (2vi), with only the NP in the object position being the only one case-marked since it is the only one that has phonetic representation and is visible to case assignment. In all the examples, past tense is almost always marked with tone on the verb, with the exception of Bamileke language in example (2ii) where tense is marked by a grammaticalized serial verb. The verbs *take* and *save* are used in different contexts to mark the accusative case for direct objects. There is also a vigorous use of serial verb constructions to mark nominal case-roles.

With regard to the dative case form in most African languages, Givon (2016:6) affirms that “almost universally, the dative-benefactive argument is marked by the serial verb 'give' and illustrates this with the following examples in (3) below:

(Yoruba)  
3. I. *mo mú iwé wá fún ò*  
1SG.NOM take.PERF book.ACC come give 2SG.DAT  
'I brought a book for you.'

ii. *mo so fún ò* (Yoruba)  
1SG.NOM say.PERF give 2SG.DAT  
'I said to you.'

(Yoruba)  
iii. *mo bá o mú iwé wá*  
1SG.NOM help.PERF 2SG.DAT take book.ACC come  
'I brought a book for you.'

(Efik)  
iv. [e] *nám útom émi ne mi*  
PRO do work.ACC Dem.this give 1SG.DAT  
'Do this work for me.'

(Efik)  
v. [e] *yét usan ne eyé*  
PRO wash dishes.ACC give 3SG.DAT  
'Wash the dishes for her/him.'

(Ijo)  
vi. *eri duma tuna-ni a piri*  
3SG.MASC.NOM song.ACC sing.ASP 3SG.FEM.DAT give  
'He sang a song for her.'

(Ijo)  
vii. *eri tari-ama áki-ni a-gbana-mo*  
3SG.MASC.NOM blessings take-ASP 3SG.DAT-place-DIR  
'He bestowed blessings upon him/her.'

(Culled from Givon (2016:6))

From example (3i-vii) above, all major object case-roles which comprise direct and indirect objects are marked with serial verbs.

Matthew (2007) refers to genitive case as a grammatical relation that expresses a possessive relationship established through the use of some form of affixation. Imoh, Yusuf & Gambo (2014:143) provide instances in Basà where the genitive marker *ò-* prefixes to the noun stem to indicate possession. This functions similarly to the genitive marker *-s* in English which when suffixed to a noun stem indicates ownership. The genitive morpheme *ò-* while inflecting the noun for possession may also undergo morphological changes as a result of the phonological conditionings of the environment of the noun to which it is prefixed. This is illustrated with the following examples:

4. i. *ùtákàda u-Lare*  
book GEN.name  
'Lare's book'

ii. *ìtime i-Bwè ni*  
farm GEN-name  
Bweni's farm

iii. *mèni mo -Huleji*  
water GEN-name  
'Huleji's water'

iv. *toga to -Sheneni*  
food GEN-name  
'Sheneni's food'

v. *rinè ri-Jèere*  
tooth GEN-name  
'Jeere's tooth'

(Culled from Imoh, Yusuf & Gambo (2014:143))

In all instances in example (4) above, the genitive marker *ò-* undergoes morphological changes to inflect for agreement with the preceding possessed noun before it becoming prefixed to the possessor noun to form a genitive NP and marks them for Genitive case. The preceding nouns determine the variant of the genitival affix since the phonetic properties of these nouns have been transferred to the affixes. This results in the derivation of *u-*, *i-*, *mo-*, *to-* and *ri-* respectively.

### Case Forms in Tyáp

Personal pronouns in Tyáp occur in four case forms. These pronouns are inflected for morphological case marking in Tyáp. These case forms include nominative, accusative, oblique and genitive. Nominative case form pronouns occur pre-verbally, accusative case form pronouns occur post-verbally, the oblique case form pronouns occur following prepositions while the genitive case form pronouns mark the nouns or the noun phrases to express possessive relation.

Case forms in Tyáp are:

5. i. Nominative case = subject
- ii. Accusative case = object
- iii. Dative/oblique case = object of preposition (indirect object)
- iv. Genitive case = possessive

Below is a table of Tyáp personal pronouns in the nominative, accusative and oblique case forms:

### Tyáp Personal Pronouns

	Nominative		Accusative		Oblique	
	Singular	Plural	Singular	Plural	Singular	Plural
1 <sup>ST</sup>	ñ' (nũñg)	zi	nĩñg	zít	anĩñg	nzít
2 <sup>ND</sup>	á	nyin	añg	nyin	anwan	nyìn
3 <sup>RD</sup>	à	ba	gu	mba	anggu	ba

The first person singular personal pronoun in Tyáp is **nũñg** 'I', but it becomes truncated to **n'** when assigned the nominative case; while the first person plural personal pronoun **zít** 'we' becomes truncated to **zi** in the nominative case form as seen in the table above. The second person singular personal pronoun **nwàn** 'you' in Tyáp has the form of **à** 'you' in the nominative case form, and **nyìn** 'You' in the accusative plural form respectively. While the third person singular personal pronoun **à** 'he/she/it' in the nominative case which takes the form **bá** 'them' in its plural form. In the accusative case, the first personal pronoun **nũñg** inflects to **nĩñg** in the singular form, while the plural form **zít** occurs in its normal form. The second person personal pronoun **à** is realized as **añg** when in the accusative case in its singular form, and changes to **nyìn** in its plural

form respectively. The third person accusative case forms for the third person personal pronouns undergo total suppletion by changing to **gú** in the singular form and **mbá** in the plural form. For oblique case assignment, personal pronouns in the singular forms are prefixed with the regular noun class prefix, and in the plural forms remain the same in both the accusative and oblique case forms with the exception of the first person plural which becomes nasalized in the oblique case form.

In Tyáp, personal pronouns undergo morphological changes for genitive case marking. The changes in the form of the pronouns bring about the expression of possessive relation with agreement in terms of person and number. Below is a table of genitive pronouns:

### Tyáp Genitive Pronouns

Person	Nominative		Accusative	
	SG	PL	SG	PL
1st	nàñ	zít	nĩñ	nzít
2nd	añ	nyin	nwán	nyìn
3rd	ñgù	bá	gù	mbà

A possessive noun phrase contains two elements: a possessor and a possessed item, where the possessor is referred to as the genitive while the possessed item is the possessee.

### Case marking in Tyáp

#### Nominative Case

The nominative case is assigned to a noun or pronoun that is subject of the verb (i.e the person or thing carrying out the action). For example:

#### 1<sup>st</sup> Person Singular

6. i. *n'* *di* *àng*  
1SG.NOM see.PERF 2SG.ACC  
'I saw you.'

ii. *n'* *wàn* *kyàyák*  
1SG.NOM cook.PROG food  
'I am cooking food.'

#### 1<sup>st</sup> Person Plural

7. i. *zí'* *lí* *achiyùì* *ká*  
1PL.NOM see.PERF rat Det  
'We saw the rat.'

ii. *zí'* *bwo* *ñg* *abwo* *ñg* *ká*  
1PL.NOM sing.PERF song Det  
'We sang the song.'

#### 2<sup>nd</sup> Person Singular

8. i. [e] *sàn* *àto?t* *hú*  
PRO buy cloth Det  
'You must buy the dress.'

When the second person singular pronoun occurs in the subject position of an imperative statement, it is not overtly realized in Tyáp, but occurs as the empty category PRO as seen in example (8i) above. It is overtly realized in a normal declarative as seen in example (8ii):

ii. *á* *li* *mbà*  
2SG.NOM see.PERF 3PL.ACC  
'You saw them.'

#### 2<sup>nd</sup> Person Plural

9. i. *ny* *n* *wàn* *kyàyák* *hú*  
2PL.NOM cook food Det  
'You(PL) should cook the food.'

ii. *ny* *n* *láu* *díd* *t* *lyàt*  
2PL.NOM make unnecessary sound  
'You (PL) make noise'

#### 3<sup>rd</sup> Person Singular

10. i. *à* *s* *wàn* *àty* *n* *àchi* *ànyùñg*  
3SG.NOM CON look.PERF stem yam one  
'He/she then looked at one yam stem.'

ii. *à* *yá* *kyàyák* *nà*  
3SG.NOM eat.PERF food Det  
'He/she ate the food.'

#### 3<sup>rd</sup> Person Plural

11. i. *bá* *yá* *àdádài* *chyi* *màng* *àmià* *ná*  
3PL.NOM eat.PERF small yam PREP oil Det  
'They ate small yam with oil.'

ii. *bá* *byià* *chét*  
3PL.NOM have strength  
'They are strong.'

#### Accusative Case Form

Accusative case refers to the direct object of a verb. Examples include:

#### 1<sup>st</sup> Person Singular

12. i. *Z* *gwái* *bài* *lí* *nìng*  
*Z* *gwái* come.PERF see 1SG.ACC  
'Z gwái visited me.'

ii. *àyàng* *n? ng* *nwàn* *n? ng*  
mother 1SG.GEN look. PERF 1SG.ACC  
'My mother looked at me.'

#### 1<sup>st</sup> Person Plural

13. i. *àty* *k wú* *byàñg* *zìt*  
man Det help.PERF 1PL.ACC  
'The man helped us.'

ii. *àbu* *ká* *vòñg* *zìt*  
dog Det chased.PERF 1PL.ACC  
'The dog chased us'

#### 2<sup>nd</sup> Person Singular

14. i. *n'* *ná* *jóng* *àng*  
1SG.NOM FUT give you  
'I will give you.'

ii. *bá lí àng*  
3PL.NOM see.PERF you  
'They saw you.'

**2<sup>nd</sup> Person Plural**

15 i. *kyàyák hú yèt à sí ny n*  
Food.NOM Det COP PREP CONSEQ 2PL.ACC  
'The food is for you.'

ii. *àty nk wú yeì ny n*  
man.NOM Det call.PERF 2PL.ACC  
'The man called you'

**3<sup>rd</sup> Person Singular**

16. i. *z ò dui gú*  
1PL.NOM meet.PERF 3SG.MASC.ACC  
'We slapped him.'

ii. *n' d ò gú*  
1SG.NOM see 3SG.FEM.ACC  
'I see her.'

**3<sup>rd</sup> Person Plural**

17. i. *àbú ká vóng mbà*  
dog Det chase.PERF 3PL.ACC  
'The dog chased them.'

ii. *Mallamì wú chwát mbà*  
teacher Det flog.PERF 3PL.ACC  
'The teacher flogged them.'

**Dative Case**

Dative case shows the indirect object of a verb.  
For examples:

**1<sup>st</sup> Person Singular**

18. i. *à bai màng àníng*  
3SG.MASC.ACC come.PERF PREP 1SG.OBL  
'He came with me.'

ii. *màn nà swan màng àníng*  
children Det.PL live PREP 1SG.OBL  
'The children live with me.'

**1<sup>st</sup> Person Plural**

19. i. *à nát màng ànzit*  
3SG.MASC.NOM go.PERF PREP 2PL.OBL  
'He went with us.'

ii. *bá sà n màng ànz t*  
3PL.NOM buy.PERF PREP 2PL.OBL  
'They bought from us.'

**2<sup>nd</sup> Person Singular**

20 i. *n' ná nát màng nwàn*  
1SG.NOM FUT go PREP 2SG.OBL  
'I will go with you'

ii. *kyàyák hú neèt màng nwàn*  
food.NOM Det come.PERF PREP 2SG.OBL  
'The food is from you'

**2<sup>nd</sup> Person Plural**

21. i. *àn ná nà nát màng àny*  
children.NOM Det.PL FUT go PREP 2SG.OBL  
'The children will go with you.'

ii. *ng w n ká kw any n mà-l*  
child.NOM Det follow.PERF 2PL.OBL PREP.behind  
'The child followed you (PL).'

**3<sup>rd</sup> Person Singular**

22. i. *à bai màng ànggú*  
3SG.MASC.NOM come.PERF PREP 3SG.MASC.OBL  
'He came with him.'

ii. *Z gwài só ng màng ànggú*  
Z gwài dance.PERF PREP 3SG.FEM.OBL  
'Z gwài danced with her.'

**3<sup>rd</sup> Person Plural**

23. i. *zí ya kyàyák hù màng mbà*  
1PL.NOM eat.PERF food Det PREP them  
'We ate the food with them.'

ii. *ngwo nseàm ká tyóng nát màng mbà*  
boy.NOM Det.SG run.PST go PREP 3PL.OBL  
'The boy ran toward them'

**Genitive Case**

Genitive case establishes possessive relationship between two NPs. Pronouns in the possessive case come in two forms. These are possessive determiners and possessive pronouns. This can be seen in the following examples in sentences:



24. i. àtoó□ thú yét à sì niñg  
cloth Det COP 3SG.AGR CONS 1SG.GEN  
'The cloth is mine.'
- ii. àyañg nuñg  
mother 1SG.GEN  
'My mother'
- iii. kyàk kwátàk àñg  
pick shoes 2SG.GEN  
'Pick up your shoes'

### Conclusion

This research discusses various types of syntactic cases found in Tyáp. It focuses on the nominative case form which is usually a pronominal occupying the position of and functioning as the subject-NP; the accusative case form which is a pronoun marked as the object-NP of the verb; the oblique case form which is the object-NP of the preposition and the genitive case form which specifies the possessor and possessee relationship. Therefore the aforementioned case forms are the main ways by which languages indicate the relationship between core NPs and the verbal predicate based on their constituent order which are identified as nominative, accusative, oblique and genitive. Parametric differences among languages determine the different positions of core NPs resulting in variation of constituent word order which can be referred to as differences in case marking.

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