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Names are predicates. This claim can mean different things to different people. Willard V. Quine thought that names were predicates in the sense that they were to be represented as general terms in translations of English sentences into the language of first-order logic. Clarence Sloat (1969) thought that "proper nouns," as he called them, were predicates in the sense that, like common count nouns, they must occur either as a bare plural or with a determiner (such as 'the', 'some', and 'a'), although 'the' would in some cases go unpronounced. Tyler Burge thought that "proper names," as he called them, were predicates in the sense that they

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1. In some works, Quine (1940, 1948, 1950) proposed that names should be translated as definite descriptions with the name itself showing up in the predicate component of that description. In *Word and Object*, Quine (1960) thought, in contrast with his earlier view, that names were predicates in their own right, not just in his regimented language.

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were true or false *of* things and should be treated as general terms in a semantic theory of English.²

While I agree with all of these claims, when I say that names are predicates, I mean that they have a predicate-type semantic value, whatever that might turn out to be. The semantic value of a predicate might be extensional: for example, a function from entities to truth values (a type- $\langle e, t \rangle$ function). Or it might be intensional: for example, a property, or a function from possible worlds to extensions.

The question which of these types might be a semantic value of a predicate is independent of the question whether names are predicates. If names are predicates, then whichever of the above semantic types that can be a value of the predicate 'planet' can also be a value of the name 'Aristotle' and vice versa.

In what follows, I assemble a variety of arguments in order to make the beginnings of the best case that I can for *Predicativism*: the view that names are predicates in all of their occurrences.³ When names appear as bare singulars in argument position, they constitute the predicative component of a *denuded determiner phrase*, a determiner phrase with an unpronounced determiner.⁴

Burge proposed that the unpronounced determiner was a demonstrative, so that bare singular names, apparently in argument positions, would constitute the predicate component of a denuded complex demonstrative.⁵

I endorse an alternative version of Predicativism, one that has already been advocated by a number of authors: the unpronounced determiner is the definite article, so that bare singular names actually constitute the predicative component of a denuded definite description.⁶

- 2. See Burge 1973.
- 3. Inevitably, the fullest case cannot be made within the confines of a single article. For further arguments, see Fara forthcoming, n.d.
- 4. I do not mean here to take a stand on the "DP hypothesis" (Abney 1987). I speak of "determiner phrases" rather than "noun phrases" for the sake of familiarity and ease of presentation.
- 5. It's not clear that Burge himself would accept this formulation of his view, but I will ignore that interpretive question here. Advocates of Burge's version of Predicativism include Reinaldo Elugardo (2002) and Sarah Sawyer (2010).
- 6. In addition to Sloat (1969), see also Richard Larson and Gabriel Segal (1995), Bart Geurts (1997), Paul Elbourne (2005), Ora Matushansky (2006b, 2008), Yu Izumi (2012), and Aidan Gray (2013).

The argument begins by reviewing familiar evidence that names are count-noun predicates in at least some of their occurrences. In addition to its thesis about the semantic type of names, Predicativism includes a thesis about their semantic applicability condition: names are true of their bearers. In sections 2 and 3, I explain this condition the being-called condition—and demonstrate that it can be given a nonmetalinguistic formulation. In section 4, I set out the denuded definite descriptions view of bare singular names. Then in sections 5 and 6, I explain Burge's 'That'-Predicativism and defend it against certain objections that would also serve against 'The'-Predicativism. Most of the positive case is located in sections 9, 10, and 11, where I appeal to some known syntactic facts in order to demonstrate that 'The'-Predicativism is not only preferable to 'That'-Predicativism but is also simpler and more explanatorily powerful than its main competitors; and in section 13, where I explain why 'The'-Predicativism survives Kripke's modal argument. I conclude with a summary and some methodological remarks.

1. Names Are Count Nouns

Some predicativists about names are moved by examples of the following sort.⁷

- (1) There is one Alfred in Princeton (based on Burge 1973).
- (2) Every Sarah I've met sometimes works as a babysitter.
- (3) Sarahs from Alaska are usually scary.

In these sentences, names occur as a complement to a quantificational or a numeric determiner or as a bare plural. In each case, we have a name occurring in a position that is typically occupied by common count nouns like 'hunter' and 'bear'. Just as we can count how many hunters or bears there are in Princeton or Alaska, we can count how many Alfreds or Sarahs there are in Princeton or Alaska. Just as we can make generalizations about hunters or bears from Alaska, we can make generalizations about Sarahs from Alaska.

Frege thought that names have descriptive, predicative conditions "associated" with them. Bespite this, Frege—like Mill before him and

^{7.} In addition to Burge (1973), see Jennifer Hornsby (1976), Elugardo (2002), Elbourne (2005), Nick Kroll (n.d.), Paul Pietroski (2007), and Sawyer (2010). Larson and Segal (1995) don't explicitly adopt the predicate view, but they find it an attractive alternative to orthodoxy. Segal (2001) later reconsiders but (sort of) rejects it.

^{8.} See Frege (1948 [1892], 210).

Kripke and Kaplan after him—thought that names were not predicates but referring expressions, by which I mean expressions with an individual as semantic value, that is, expressions of type $e.^9$ Since Frege, Kripke, and Kaplan never explicitly considered cases where names occurred in the plural, or with determiners, they didn't qualify their claims that names had individuals as their semantic values. Thus we could call the view that names always have an individual as a semantic value the Frege-Kripke view of names. The point in so doing would be to emphasize the diversity of the views that I'm rejecting. ¹⁰ The debate between Fregean descriptivists on the one hand and Millian or direct-reference theorists on the other is a debate that is properly understood as a debate between two different referentialist camps.

There is another way to carve up the referentialist view, one that's orthogonal to the divide between descriptivists and Millian or directreference theorists. I take Referentialism to be the view that when names occur as bare singulars in argument position, they are referring expressions, not predicates. There is no way to accommodate names in predicate position as normal referring (type e) expressions. So referentialists may be either (i) uniform referentialists, who say that occurrences of names in predicate positions are nonliteral or perhaps deviantly derived from the more basic singular-term use, as verbs are sometimes derived from nouns or adjectives, a shift objected to by linguistic conservatives as when 'express' is now used as a verb ("This train is expressing to New York") derived from an adjective ("This is the express train to New York") or (ii) nonuniform referentialists, who say that when names occur as bare singulars in argument position, they are referring expressions, but when they occur otherwise, they are literal, perhaps nonderived predicate expressions.

My view is that names are predicates in all of their occurrences, even when they appear to be bare singulars in argument position. I call this view *Predicativism*. In all of their occurrences, names have a predicate-type semantic value. My arguments for Predicativism do not depend on details that distinguish the two versions of Referentialism. Thus the difference between Uniform and Nonuniform Referentialism (if there is such a difference) is not one that matters to me here. Thus I will use the term 'Referentialism' to include both the uniform and nonuniform versions.

^{9.} See Frege (1948 [1892]), Kripke (1980 [1972]), and Kaplan (1989).

^{10.} But in so doing, I do not mean to suggest that the view, as I just stated it, can be found in the writings of Frege, Kripke, or Kaplan.

Here are two more examples from Burge in which it is uncontroversial that names are occurring as predicates. ¹¹

- (4) An Alfred who joined the club today was a baboon.
- (5) Some Alfreds are crazy; some are sane.

The names in these sentences occur as count nouns: in the first case, in the singular as a complement to the indefinite article, and in the second case, in the plural.

The following examples suggest that names do not naturally occur as mass nouns.

- (6) a. There is not much dust in Princeton.
 - b. * There is not much Alfred in Princeton.
- (7) a. Most dust is allergenic.
 - b. * Most Alfred is allergenic.

2. Names Are True of Their Bearers

There's no controverting Burge's view that names occur at least sometimes as predicates with multiple application. In these occurrences, they are predicates that are true of their bearers. The predicate 'Tyler' is true of both Tyler Burge and Tyler Doggett; this is partly why (8) is true.

(8) There are at least two Tylers with philosophy degrees from Princeton.

'Tyler', in 'at least two Tylers', can be occurring only as a predicate, given that it occurs in the plural as the complement of the complex numerical determiner 'at least two'. Further, this predicate 'Tyler' has multiple application, since there can be at least two Tylers from Princeton only if the predicate 'Tyler' applies to at least two things. Finally, and no less obviously, this predicate 'Tyler' applies to all the things called Tyler, and to them only; if there weren't two people *called* Tyler with philosophy degrees from Princeton, the sentence would not be true.

Let me strengthen these last two claims by saying that names in these positions satisfy the *being-called condition*. It's best to represent this condition as a schema, where the schematic letter, capital en, is to be replaced by a name.

^{11.} Uniform referentialists could coherently say that these predicate occurrences are derived from standard occurrences, on a par with 'fax', 'contact', or 'express' when they occur as verbized nouns.

(BCC) 'N' (when a predicate) is true of a thing just in case it is called N.

I claim that in every case where a word occurs as a name, it is a predicate with (potentially) multiple application. The condition of its application is given by the *being-called condition*. (Of course I don't mean that the condition holds in cases where names are used metaphorically, with deferred interpretation [à la Nunberg 1995, 2004], or metonymically in any way, any more than I would insist on the standard application conditions for other predicates when used in one of those ways.)

The being-called condition was just expressed as a schema. We write down an instance of that schema by writing it down with both occurrences of its schematic letter, capital en, replaced by a word of the indicated category. In this case, it is names that are in the indicated category. Here, then, are some instances of the schema:

- (9) 'Aristotle' (when a predicate) is true of a thing just in case it is called Aristotle.
- (10) 'Tyler' (when a predicate) is true of a thing just in case it is called Tyler.

The being-called condition is to be distinguished from a different but related condition, which I call the *bastardized being-called condition*, expressed as a universal quantification.

(*BBCC*) For every name *N*, *N* (when a predicate) is true of a thing just in case it is called *N*.

Here, the capital letter en is not a schematic letter but rather an objectual variable bound by a first-order universal quantifier. To make this more perspicuous, we might use a lowercase letter instead of an uppercase one as our variable:

(BBCC) For every name x, x (when a predicate) is true of a thing just in case it is called x.

Here are some instances of the bastardized being-called condition:

- (11) 'Aristotle' (when a predicate) is true of a thing just in case it is called 'Aristotle'.
- (12) 'Tyler' (when a predicate) is true of a thing just in case it is called 'Tyler'.

One difference between the two conditions is obvious: in the being-called condition the name 'Alfred' is used, while in the bastardized

being-called condition the name 'Alfred' is mentioned. An instance of the bastardized being-called condition can contain only a quoted name after the past participle 'called', while an instance of the being-called condition proper may contain an unquoted name after 'called'. This is precisely why our version of the being-called condition must be expressed as a schema.

A related difference between the two is that the passive verb form 'is called' in the bastardized condition is followed by an individual-level objectual variable and must therefore be a relation expression with at least two arguments: a grammatical subject (that which is called something) and an object (what the subject is called). Meanwhile, the past participle 'called' in the being-called condition proper is not followed by an individual-level objectual variable, but rather by a schematic letter that is to be replaced by a name, which may in turn be unquoted. On my view, these are occurrences of names as predicates. So on my view, the passive verb 'called' is not being treated as a relation expression but rather a bit more like a copula—like 'turned' in 'he was turned green by the witch'. If this view of 'called' is correct, then the bastardized being-called condition is ungrammatical since it would have an individual-level variable occurring in a predicative position. It would be like writing 'x was turned y (by the witch)'.

On the flip side, if a 'called' predication could be true only if 'called' were followed by a quote-name, as in "Socrates was called 'Socrates'," then no instance of the being-called condition proper would be true. From the perspective of a proponent of the bastardized being-called condition, instances of the being-called condition proper are roughly incoherent. On their view, to say that Obama is called Barack is not to say that Obama has a certain name, but rather that Obama is called a certain person—himself.

3. Names Are Predicates in the Being-Called Condition

We had said (schematically) that a name 'N', when it occurs as a predicate, is true of a thing just in case that thing is called N. We called this the being-called condition. Using double-bracket notation to represent

^{12.} For ease of exposition, I'm pretending that putting a name in quotes is the only way to form a name for it.

the function from a predicate to its extension, we state the being-called condition (schematically) as follows:

(13) When 'N' occurs as a predicate, $[[N']] = \{x : x \text{ is called } N\}$.

The grammaticality of (13) turns on whether 'N', in 'x is called N', is in a predicate position. This is the position of the predicate 'supportive' in 'x called y supportive' or that of 'a saint' in 'Erica called Lorenzo a saint'. In 'Erica called Lorenzo supportive', 'Lorenzo supportive' is a *small clause*, a subject-predicate construction with no finite verb to connect the subject with the predicate.¹³ In 'Erica called Lorenzo a saint', 'Lorenzo a saint' is a small clause.

'Called' is not the only verb to take a small-clause complement. In 'Erica made Lorenzo mad', 'Lorenzo mad' is a small clause.

In 'Lorenzo drunk himself silly', 'himself silly' is a small clause with a reflexive pronoun in its subject position.

13. For syntacticians, to say that these strings constitute small clauses is to say that they form a syntactic constituent. Whether this is so has been a matter of debate. Effectively, the question is whether 'Lorenzo' in (14) is a syntactic subject of the "small clause," and if so, in what sense formally? But that debate is not relevant for us here. The position occupied by 'supportive' in (14) is uncontroversially a predicate position, and the position occupied by 'Lorenzo' is uncontroversially in a position to be occupied by the *semantic* subject of that predication. That is all that matters for us. So when I say that a phrase is a small clause, I can be interpreted as saying that it would be called a small clause by the syntacticians who advocate a small-clause analysis of these constructions.

For significant early discussions in developing and promoting small clauses, see Tim Stowell (1981, 1983). For a briefer early defense of small clauses, see Ken Safir (1983). See Edwin Williams (1983) for some objections to small clauses. And Stowell (1995) provides a useful overview.

The claim here is that in 'My parents called me Delia', 'me Delia' is a small clause. ¹⁴

The pronoun 'me' occurs in its subject position, and the name 'Delia' occurs in its predicate position.

(18) My parents called me Delia small clause.

Ora Matushansky (2005, 2008) has supported the latter claim by pointing out, among many other facts, the following: if appellative 'call' were a verb that allowed for two objects—as it would have to if the bastardized being-called condition were grammatical—then it should be passivizable in both of its object positions. But it is not. Contrast the active-passive counterparts in (19) with those in (20) and (21).¹⁵

A paradigm double-object verb, such as 'give', is passivizable in both of its object arguments.

- (19) a. Maria gave Carlos a book.
 - b. Carlos was given a book by Maria.
 - c. A book was given (to) Carlos by Maria.

But appellative 'called' does not have this property.

- (20) a. My parents called me Delia.
 - b. I was called Delia by my parents.
 - c. *Delia was called of/to/for me by my parents.

Not surprisingly, we see the same pattern with appellative 'called' with an adjective in its appellation position.

- (21) a. Erica called Lorenzo supportive.
 - b. Lorenzo was called supportive by Erica.
 - c. *Supportive was called Lorenzo by Erica.

So on the right-hand side of the being-called condition, the name 'N' occurs in the predicate position of a small clause. For example, 'Willard' is in a predicate position in the sentence 'Hattie called Quine Willard'.¹⁶

- 14. See Matushansky (2005) for defense of this latter claim.
- 15. In the remainder of this section, I merely elaborate this one particular argument of Matushansky's. She has a number of others.
- 16. I should say that while the failure of the passivizability of 'Willard' here is a necessary condition for the small-clause analysis, it is not a sufficient condition. There may be failures of passivizability in the case of arguments, for example, measure phrases in a sentence such as 'Jon Rauch is seven feet tall'. (Thanks to Ora Matushansky for pointing

I use the term "appellative 'call'" for occurrences like those in (14), (15), and (18). By *appellative 'call*' I mean the verb that we use when we say that someone has called someone something. My father called me Delia; my father called me stubborn. We naturally say, in each case, that my father called me something. Both cases involve what I'm calling appellative 'call'. ¹⁷ Here's one proposal of a semantic analysis for appellative 'call': 'x called y F' is true just in case x said or did something that entails or presupposes that y is F^{18} This proposal warrants further discussion, but I will not pursue that here.

I contrast appellative 'call' with "summoning 'call'," which is the verb that we use when we say that someone called someone or that someone called something or someone *for* someone. (Summoning includes telephoning.) I use "appellative 'call'" to exclude *summoning 'call*' but to include the *calling* that we normally describe as *calling someone names*. In the everyday sense, if I've called you scrawny and lazy, then I've called you names. So that is a use of appellative 'call'. Unlike appellative 'call', summoning 'call' is passivizable in any of its object positions.

- (22) Single-object summoning 'call':
 - a. Maria called Pilar at three o'clock.
 - b. Pilar was called by Maria at three o'clock.
- (23) Double-object summoning 'call':
 - a. Choate called Howlett a cab.
 - b. Howlett was called a cab by Choate.
 - c. A cab was called for Howlett by Choate.

Have you heard the old joke about calling someone a cab?

HOWLETT: Choate, will you call me a cab?

CHOATE: OK, you're a cab.

The joke plays on the homonymy of the two 'call's. Howlett's request is that a cab be summoned for him by Choate. If Choate had called Howlett

this out to me.) But there is not consensus about whether measure phrases are arguments. See Schwarzschild (2005) for arguments against.

^{17.} Think of it this way. I use 'something' here the way we use 'everything' when we say "Jack has been everything" to imply that he's been a carpenter, he's been an actor, he's been a waiter, he's been a teacher, and so on.

^{18.} See, by way of comparison, Fara (2011), where it is proposed that 'x called y F' is true just in case x said or did something that entails that y is F (no allowance for presupposition).

a cab in that sense, then we could say, in the passive voice, both (23b), that Howlett was called a cab by Choate and (23c), that a cab was called for Howlett by Choate. But given what Choate in fact did, namely, say to Howlett that he is a cab, the passive voice allows us only to say the former, (23b): that Howlett was called a cab by Choate.

In other words, if Choate had done what Howlett wanted him to do, then all of (23a-c) would have come to be true. But given what Choate in fact did, (23c) did not come to be true; only (23a-b) did. When we say that Choate called Howlett a cab, the indefinite description 'a cab' is in the direct-object position of a double-object verb if we're using summoning 'called'. But if we're using appellative 'called', then the description 'a cab' is in the predicate position of a small clause. Thus passivizability from the direct-object position of summoning 'called' distinguishes the two.

4. Names Appearing to Be in Argument Position Are Embedded in Denuded Definite Descriptions

Names do not always appear in predicate positions. They also sometimes appear as bare singulars in argument positions: as subjects, direct objects, indirect objects, and objects of prepositions.

- (24) Venus is celestial.
- (25) Hattie loved Willard.
- (26) Hattie gave Willard a book.
- (27) Marjorie went to the restaurant with Willard.

The names here do not appear to be in predicate positions. Abstraction from these positions yields perfectly good propositional functions, in Russell's (1903) sense.

- (24') x is celestial.
- (25') x loved y.
- (26') x gave y a book.
- (27') x went to the restaurant with y.

It is natural to adopt Referentialism in light of commonplace examples like these. Frege's view in "Sense and Reference" was that the "Bedeutung" (that is, the *semantic value*) of 'Venus' is an individual, and the Bedeutung of the unsaturated predicate '___ is celestial' is a function, which when supplied with an individual as argument yields THE TRUE or THE FALSE as a value. In other words, the semantic value of 'Venus' is an entity on Frege's view, and the semantic value of '___ is celestial' is a

function of type $\langle e, t \rangle$. The sentence (24) is true since the semantic value of '___ is celestial' yields THE TRUE when applied to the entity Venus, the semantic value of 'Venus'.

This is a pleasingly simple semantic analysis of subject-predicate sentences with names as subjects. More than one well-known philosopher of language has said to me that names in predicate position are just clearly used differently from names in argument position; in predicate position a name N is a "metalinguistic" predicate, true of just those things that have N as a name. The suggestion is that we can keep the Frege-Kaplan view of names and just set aside predicative names as requiring no more discussion than that.

I take a different approach. I do not think we should set aside names in predicate position as ubiquitous deviants. We would do best to try to develop a unified theory of names appearing in predicate positions and in argument positions. Moreover, I take this approach from the opposite direction. I begin with an account of names appearing in predicate position. Subsequently, I develop that account so that it extends to names appearing to be in argument positions. I take the analysis of names as multiply applicable predicates as a starting point and proceed from there. The question facing us now, then, is this: if names are predicates, not referring expressions, not, that is, expressions with an individual as a semantic value, not, that is, expressions of type e, then how could a name compose with an individual-level predicate to yield a truth value?

According to the theory I'll maintain, when a bare singular name appears in argument position, it is the predicative component of a *denuded definite description*, by which I mean a definite description with an unpronounced definite article. ¹⁹ The view is related to, but not the same as, Kent Bach's (1987, 2002) "Nominal Description Theory." According to Bach, a name 'N' is "semantically equivalent" to the description 'the bearer of 'N''. ²⁰ This is different from the version of Predicativism defended here, though. According to the being-called condition, a name 'N' is semantically equivalent to the predicate 'thing called N'. This latter predicate is equivalent to 'bearer of 'N'' (see note 26), so for us, it is ' \mathcal{O}_{the} N' that is equivalent to 'the bearer of 'N''.

^{19.} This view is held by Elbourne (2005), Izumi (2012), Larson and Segal (1995), Matushansky (2006b, 2008), and Sloat (1969).

 $^{20.\,}$ Others who could be classed with Bach here are William Kneale (1962), Geurts (1997), and Jerrold Katz (2001).

What appears on the surface as (28) is underlyingly really (29).²¹ (' \emptyset_{the} ' is the unpronounced definite article.)



On the view I endorse, therefore, the compositional semantics and the syntactic form of sentences containing names will be special cases of sentences containing other descriptions, numerical phrases, quantified noun phrases, complex demonstratives, or bare plurals. Whatever syntactic form the (a) sentences below have, the (b) sentences have that form as well. In whatever way the elements of the (a) sentences formally compose to yield a proposition or truth value, the corresponding elements of the (b) sentences formally compose in that way too.

- (30) a. The table is tall.
 - b. \emptyset_{the} Maria is tall.
- (31) a. The table in my room is tall.
 - b. The Maria in my room is tall.
- (32) a. The lady was buying one desk while seated at another.
 - b. \emptyset_{the} Jacquie was reading one Aristotle while married to another.
- (33) a. Some people read history, others make it.
 - b. Some Williams read history, others make it.
- (34) a. Bears from the north are usually scary.
 - b. Sarahs from \emptyset_{the} Alaska are usually scary.
- (35) a. That man hates to swim.
 - b. That Maria hates to swim.
- (36) a. That man sure does love to swim.
 - b. That Natalia sure does love to swim.

^{21.} In a number of natural languages, definite articles before unmodified singular names can, at least sometimes, get pronounced. Examples are Portuguese, Modern Greek, French, German, Italian, and Spanish. See Matushansky (2006b, 2008) for extensive cross-linguistic and intralinguistic discussion of the different strictures of different languages on the occurrence of an overt definite article with unmodified singular names. This is a standard sort of evidence for the proposed phonologically null definite article in English when it is in that same position.

- (37) a. The book was laid on the table.
 - b. The book was written by \emptyset_{the} Kripke.
- (38) a. Every woman who owns a donkey beats it.
 - b. Every woman who knows an Agatha loves her.
- (39) a. If Lexi buys a horse and rides it, then her donkeys will be upset and kick the horse as often as they can.
 - b. If Alexa meets a Bucephalus and marries him, then her parents will be upset and insult \emptyset_{the} Bucephalus as often as they can. ²²

In each case, the semantic types of the expressions in the (b) sentences will be the same as those of the corresponding expressions in the (a) sentences. Since the common nouns in the (a) sentences all have predicate-type semantic values, the names in the (b) sentences all do as well. The truth values of, and the propositions expressed by, the (b) sentences will therefore be determined in the same compositional way as those of the (a) sentences.

Because my view of the syntax and compositional semantics of names is parasitic on the syntax and semantics of other count nouns, I do not need to provide detailed investigation or elaboration of their syntax and compositional semantics in order to present my view. In general I entitle myself to say here just that the syntax and compositional semantics of names piggybacks on those of other count nouns. But let me clarify two points.

First, in saying that the syntax of names piggybacks on that of common nouns, I do not mean to say that there is no syntactic difference between names and common nouns. There must be *some* syntactic difference between them. Otherwise we would not have 'the' being permitted to occur before the noun in 'the man is on the road' but prohibited (in English) from occurring before the name in 'Pierre is on the road'. I mean rather to be making conditional claims like the following: if the bare-plural construction in 'bears are scary' contains a syntactically real but unpronounced generic operator, then so does the bare-plural construction in 'Sarahs are scary'; if the semantic value of 'bears' in 'bears are

^{22.} This sentence is based on ones from Elbourne (2005, 182), 'If John insists on calling his next son Gerontius, then his wife will be annoyed and Gerontius will get made fun of because of his name', and Geurts (1997, 322), "If a child is christened 'Bambi', and Disney Inc. hear about it, then they will sue Bambi's parents".

scary' is the set of all sums of individual bears, then the semantic value of 'Sarahs' in 'Sarahs are scary' is the set of all sums of individual Sarahs.²³

Second, in saying that the compositional semantics of names piggybacks on that of common nouns, I mean only to say that names and common nouns have the same type of semantic value, not that they have the same conditions of application. The truth conditions of sentences containing the one are compositionally determined in just the same way as those containing the other. For example, as I said at the outset, I would take names to have the same predicate-type semantic value that other common nouns have, whatever that might be. Wherever common nouns are best treated as having an extensional semantic value, names are too. Wherever common nouns are best treated as having an intensional semantic value, names are too. Piggybacking does not, in contrast, require that names and other common nouns have the very same form of application conditions.

The name 'Michael' applies to a thing just in case it is called Michael. It does not follow that the common noun 'sage' applies to a thing just in case it is called a sage. My parents called me a sage; that did not make me one. In contrast, my parents did call me Delia, and that did make me a Delia. The relevant sense of 'called' here is not the one used in disquotational truth and application conditions, *pace* Kripke (1980 [1972], 68–70). We are not saying that to be called Michael *just is*, with nothing more to be said, to be in the extension of the name 'Michael'. Rather, being called 'Michael'—being in the extension of the name 'Michael'—is something like having been dubbed Michael, with the name 'Michael' continuing to be used to refer to you in ways that are caused, with a chain of intentionally reference-preserving links, by the original dubbing. Thus Kripke's "causal theory of reference" could well be maintained as an analysis of *what it is* to be called Michael—to be in the extension of the name 'Michael'.²⁴

5. Burge Said 'That'

Burge (1973, 430) advocated a version of the being-called condition: "A proper name is (literally) true of an object just in case that object is given the name in an appropriate way." This invites the question: *appropriate for*

^{23.} This view of plurals as true of "sums" was proposed by Richard Sharvy (1980).

^{24.} For a recent investigation of the nature of the property of bearing a particular name, see Gray (2013).

what? I presume that Burge intended to rule out cases in which you're given a name without that name becoming a name of yours. For example, in order to preserve anonymity, the doctors gave their patient the pseudonym 'Linda'. But the patient was not given the name 'Linda' in the appropriate way, in Burge's sense, because the name did not thereby become a name of hers. So although Burge's criterion does not overtly involve the notion of being called something, I consider it to be a version of the being-called condition since in my view for a thing to be called N just is for it to have been given the name 'N' in such a way that 'N' becomes a name of its. This in turn is equivalent to being a bearer of the name 'N'. So to be called N is to have been given the name 'N' in an "appropriate way"—that is, to have 'N' be a name of yours—which in turn is to be a bearer of the name 'N'.

Since Burge accepted (his own version of) the being-called condition for all occurrences of names—those appearing in argument position as well as those appearing in predicate position—he also faced the problem of how to give a compositional semantics for names appearing in argument position. But whereas we proposed that a name appearing in argument position is embedded in a denuded definite description, Burge proposed that a name appearing in argument position is embedded in a denuded complex demonstrative.

Whereas we proposed that 'Maria is tall' was to be interpreted as ' \emptyset_{the} Maria is tall', Burge proposed that it is to be interpreted as ' \emptyset_{that} Maria is tall'. ²⁷ Let's call the two views 'The'-Predicativism and 'That'-Predicativism.

25. So it seems to me. Surely we could devise a more convincing example should need be.

26. I regard Burge's "appropriateness" condition as equivalent to the being-called condition, even though it is not expressed in terms of the 'called' relation. Bach (1997, 2002) argues for what I consider to be a version of Burge's appropriateness condition. Bach's version is expressed as a "name-bearing" condition: 'Aristotle' applies to a thing just in case it bears the name 'Aristotle'. Geurts also argues for the name-bearing condition. I regard the appropriateness and name-bearing conditions as equivalent to one another (and both to the being-called condition) since—expressed schematically—having 'N' be a name of yours and bearing the name 'N' are equivalent to being called N, even though the name 'N' occurs in a predicate position in the being-called condition, while it is the name of that name, "N", that occurs in a predicate position in the appropriateness and name-bearing conditions. To be called N is to have N as a name of yours. And to be a bearer of the name 'N' is to be called N.

27. I should mention that Burge did not frame his analysis in quite these terms. Burge never made explicit mention of an *unpronounced* 'that'. Rather, he spoke of names that

The two versions of Predicativism are closely allied, but the definite-description version explains, as we'll see in section 9, certain linguistic facts that make it irresistible and in any case, far superior to its complex-demonstrative cousin.

Burge's own direct argument for 'That'-Predicativism is compressed. ²⁸ Let me quote it in full:

Evidence for the view that proper names in singular unmodified form involve a demonstrative element emerges when one compares sentences involving such names with sentences involving demonstratives. Apart from speaker-reference or special context, both

Jim is 6 feet tall

and

That book is green

are incompletely interpreted—they lack truth value. The user of the sentences must pick out a particular (for example, a particular Jim or book) if the sentences are to be judged true or false. It is this conventional reliance on extrasentential action or context to pick out a particular which signals the demonstrative element in both sentences. (Burge 1973, 432)

Here Burge points out that sentences involving names—whether or not names are predicates—do not have a truth value independently of context. A brutely applied disquotational truth clause for the sentence 'Jim is six feet tall' is not true:

(40) 'Jim is six feet tall' is true just in case Jim is six feet tall.

That is no more true than this is:

(41) 'I am hungry' is true just in case I am hungry.

Your utterance of the sentence may be true even if I am not hungry. Similarly, if when I utter (40) I am saying anything at all, then in using 'Jim' on the right-hand side I must use it to refer to some particular Jim. But when you utter the sentence mentioned on the left-hand side, if you are to make any claim at all, then you must refer to some particular Jim.

appear in argument position as "involv[ing] a demonstrative element" (Burge 1973, 432). As Jeffrey King (2006, 148–50) has pointed out, there is more than one way to interpret this claim.

^{28.} Elugardo (2002) and Dolf Rami (2014) have done an admirable job of extracting and fleshing out an explicit argument for Predicativism from Burge's text.

But they needn't be the same Jim. The Jim I refer to is six feet tall. But the Jim you refer to is less than six feet tall. The truth clause must depend on context:

(42) An utterance of 'Jim is six feet tall' is true in a context just in case its agent, in making the utterance, refers to some particular Jim and that Jim is six feet tall at the time of the utterance.

By now, we have all learned from Kripke's "semantic argument" that when we do refer to some Jim on an occasion, using the name 'Jim', this cannot always be a result of our having some substantive description of Jim that applies to him and no one else. Jim might well not uniquely satisfy any description that we associate with him. We may refer to him nevertheless.

Nor need we *believe*, Kripke also taught us, that we have some uniquely identifying substantive description of him. I do not believe that I have any substantive *uniquely* identifying description of Cicero the Roman orator. (Whether that is right depends on what notion of "substantive" is in play, though Kripke does not use that word.)

Burge concludes that since we can succeed in saying something about a particular Jim, even though there are many Jims, the particular Jim that we're talking about must have been demonstrated or picked out in some way. Since Burge is concerned to develop a unified semantics of names as predicates, he needs a name appearing in argument position to be embedded within some phrase that can both appear in argument position and have a "demonstrative element"—where the name is the only part that gets pronounced. Complex demonstratives are such expressions, so he plumps for 'that', having already rejected 'the' on the grounds that names typically do not have singleton extensions.

6. Against an Argument against 'That'

Some opponents of Burge's view object to it because they object to the being-called condition.²⁹ Others object to it because they object to a null 'that'. I'll consider one such argument, a syntactic one due to Jeffrey King (2006). As I'll show, the argument fails because it applies too widely. I consider King's syntactic argument here because it would damage 'The'-Predicativism as much as 'That'-Predicativism if it did not fail.

^{29.} See, for example, Stephen Boër (1975).

King's Syntactic Argument

King observes that an overt appearance of 'that' can affect grammaticality. He points to a contrast like that between (43) and (44) and takes this contrast to disconfirm 'That'-Predicativism. He writes:

The count noun 'dog' [in (44)] cannot be used to designate a particular dog. So here the advocate of the predicate view of names has to hold that names *qua* count nouns exhibit exceptional behavior not exhibited by other count nouns.

- (43) John is kind.
- (44) * Dog is kind. (King 2006, 149).

Plainly, names do not exhibit the same behavior as common count nouns. But that is not a strike against 'That'-Predicativism. For consider an analogous argument against the view that mass terms are nouns.

The mass term 'dust' in (46) cannot be used to designate the kind of thing that can be counted. So the advocate of the view that mass terms are nouns has to hold that mass terms *qua* nouns exhibit exceptional behavior not exhibited by other nouns.

- (45) How many dogs do you have?
- (46) * How many dusts do you have?

Why isn't this a good argument against the nounhood of mass terms? Because there *is* more than one kind of noun. There are mass nouns and count nouns, among others. Nouns are not all alike in all respects. Some nouns can be used to count the things that they apply to; others cannot.

Similarly, nouns are not all syntactically alike. A mass term cannot complement the indefinite article. (Witness: 'I vacuumed up a dust this morning'.) A count noun can. If one is to maintain that mass terms are nouns despite their syntactic and semantic differences from count nouns, then one should have an independent criterion for being a noun and show that mass terms satisfy that criterion.

Likewise, if one is to maintain that names are count nouns, then one should have an independent criterion for being a count noun and show that names satisfy that criterion. Things are better if we can also make some diagnostic generalizations about the syntactic differences between names and common count nouns. In the case of mass terms, we can make a number of syntactic generalizations. Mass terms cannot complement the determiners 'a' or 'every'; they cannot occur in the

plural; they cannot complement 'how many', but they can complement 'how much'.

We will see that 'the'-predicativists can make correspondingly predictive generalizations about names as compared with common count nouns. We will make good on that claim in section 9.

So Burge has a quality response to King's syntactic argument. King's argument requires that if names are count nouns, they must have the same syntactic properties as common count nouns. We have already seen that this is not so. Common count nouns, such as 'dog' in (44), cannot appear as bare singulars in argument position. Names, such as 'John' in (43), can. This no more tells against names being count nouns than do the syntactic differences between count and mass nouns tell against the thesis that mass nouns are nouns. It does, though, show that names and common count nouns are not in the same syntactic class. So Burge's 'That'-Predicativism survives.

That said, I nevertheless reject 'That'-Predicativism in favor of 'The'-Predicativism. That is because 'The'-Predicativism is better motivated and allows for a more satisfying and cohesive account of the syntactic differences between names and common count nouns.³⁰

7. Two Terminological Clarifications

Before proceeding let me make two quick points about my terminology. One concerns the use of the term 'proper name'. The second concerns the use of the term 'common noun'.

Being Proper Is Not an Interesting Property

When philosophers and linguists use the phrase 'proper name', they usually mean a name that denotes an individual of a certain sort, for example, a person, a pet, a country, or a planet. But that list is (obviously) not exhaustive. Names of companies, for example, 'Polaroid', are considered to be proper names. Names of months and days are considered to be proper names, but names of seasons are not. According to the *Chicago Manual of Style* (16th ed., 5.6), "A proper noun is the specific name of a person, place, or thing ..., or the title of a work." But for the purposes of this definition, what is a "thing"? Names of words, such as the name of

^{30.} Rami (2014) offers a series of objections to 'That'-Predicativism. Unlike with King's objections, I find Rami's persuasive. But also unlike King's objections, they do not equally well apply to 'The'-Predicativism.

the word 'philosophy' (''philosophy''), are not considered to be proper names. But surely words are things. So how do we decide which sorts of things are the ones whose names are proper names?

We don't need to try to decide. There is no grammatical difference between names of towns, such as 'Princeton', which are considered to be proper names, and names of words, such as 'Princeton', which are not considered to be proper names. I don't believe that there is any interesting distinction between the names that are proper and the names that aren't that can be made apart from the usage that's recommended by style guides. I choose to use the phrase 'proper name' just to mean a name that English-language style guides in general recommend capitalizing. Since for the purposes of this essay capitalization conventions are irrelevant, I eschew usage of the term 'proper name' here.

Names Are Never Used as Common Nouns

One of the most dogged criticisms of Predicativism is based on the fact that names and common count nouns are not syntactically alike. Recall King's pair from the previous section, along with its opposite.

(43) John is kind.
 (44) * The John is kind.
 (48) The dog is kind.

The word 'John' is a name in these sentences. The word 'dog' is a common noun. Both are count nouns. The minimal pairs above demonstrate that although names and common count nouns are both count nouns, they are in different syntactic classes.

The grammatical distributions of names and common count nouns do, however, coincide in many cases. We have seen a number of examples already ('There is one Alfred/university in Princeton', 'Every Sarah/teenager I've met sometimes works as a babysitter', 'Sarahs/Bears from the north are usually scary', and so forth). But I will never say, as some authors do, that in such cases a name is used *as* a common noun in such sentences. As I use the terms, the categories *name* and *common noun* are mutually exclusive. Their grammatical distribution coincides substantially, but not entirely. They differ syntactically in that names but not common count nouns can appear as bare unmodified singulars in argument position.

8. Segal's Challenge

Gabriel Segal made a syntactic argument against 'The'-Predicativism that's just like King's syntactic argument against 'That'-Predicativism.

Segal writes:

Explicit [determiner[name]] constructions do not function exactly like names with no explicit determiner attached. Witness (49).

(49) a. I live in London.

b. ?? I live in the/that London.

(49a) provides a perfectly idiomatic response to the question 'where do you live?' posed in an ordinary context...when [the] audience would naturally interpret 'London' as London, England. In the same context, (49b) would sound bizarre.

Contrast (50), uttered in a context in which London, Ontario is not out of the picture.

- (50) a. I live in the London that's in S.E. England.
 - b. I live in that London (pointing from the window of a suitably positioned aeroplane).

And consider finally (51).

(51) a. This is the/that John I mentioned yesterday.

b. * This is John I mentioned yesterday.

If there is a hidden determiner in (49a) and (51b), it is evident that there are some special rules governing when it can appear on the surface and when it cannot. ['The'-Predicativism] stands in serious need of a well-motivated account of these rules. (Segal 2001, 560–1)

Indeed.

Segal here has challenged the 'the'-predicativist to explain the data in (49)–(51) in light of her two views that (i) names are a species of count noun and that (ii) bare singular names appearing in argument position complement an unpronounced definite article.³¹ To meet this challenge, we must provide explanations of the kind mentioned in response to King's syntactic argument against a null 'that' in the previous section. These were (A) there must be an independent criterion for being a count noun and (B) we should be able to make some predictive gener-

31. Segal attributes the argument to James Higginbotham (1988).

alizations about the syntactic differences between names and other count nouns. We can meet both of these challenges.

- (A) For x to be used as a count noun is for x to be used as a noun that applies to things that can be grammatically counted *using* x *itself*.³²
 - For example, 'dust' cannot be used as a count noun since we cannot grammatically count in this way: one dust, two dusts, three dusts,...; 'cat' can be used as a count noun since we can grammatically count in this way: one cat, two cats,.... Names pass this test easily. Just as we can count the number of cats in my house using the noun 'cat', we can count the number of Johns in my department using the noun 'John': one John, two Johns,....
- (B) We can also make predictive generalizations about the syntactic differences between names and other count nouns. Sloat (1969) has already provided such a generalization. We will provide a slight amendment to Sloat's generalization about the distribution of determiners with names and other count nouns. Then we will formulate a syntactic hypothesis that accounts for it.³³

9. Why 'The'?

Sloat laid out a chart comparing the distribution of determiners with phrases containing common count nouns with the distribution of those same determiners with a name put in for the common noun. He considers (i) the indefinite article, (ii) 'sm', which is the unstressed 'some' that occurs with plurals and mass nouns, (iii) 'sóme', which is the 'some' that is typically well represented by the existential quantifier, (iv) bare plurals, and (v) the definite article. I have added to his chart some rows for the demonstrative 'that'. Asterisks indicate unacceptable sentences; question marks indicate marginally acceptable sentences.

^{32.} The criterion as framed here is use dependent because, as Kathrin Koslicki (1999) has emphasized, that whether a noun is a mass noun or a count noun can be use dependent ('There's hair in my soup' versus 'There's a hair in my soup').

^{33.} Whereas here we offer a syntactic criterion for when the determiner may be dropped, Sawyer (2010, 217), in defense of 'That'-Predicativism, proposes a semantic criterion. The syntactic criterion is preferable because on the one hand, it applies categorically and on the other hand, there is never any unclarity as to whether it applies in a given case.

The Sloat chart (Sloat 1969, 27)

A man stopped by.	A Smith stopped by.
* Sm man stopped by.	* Sm Smith stopped by.
Sóme man stopped by.	Sóme Smith stopped by.
Sm men stopped by.	Sm Smiths stopped by.
Sóme men stopped by.	Sóme Smiths stopped by.
Men must breathe.	Smiths must breathe.
The clever man stopped by.	The clever Smith stopped by.
The man who is clever stopped by.	The Smith who is clever stopped by.
A clever man stopped by.	A clever Smith stopped by.
The men stopped by.	The Smiths stopped by.
The man stopped by.	* The Smith stopped by.
* Man stopped by.	Smith stopped by.

That clever man stopped by.	That clever Smith stopped by.
?? That man who is clever stopped by.	?? That Smith who is clever stopped by.
* That men stopped by.	* That Smiths stopped by.
That man stopped by.	That Smith stopped by.

Note that 'the' is distinguished as the only one of the determiners that differs in its distribution with names as compared to common count nouns. That is, the following are the only two rows of the table in which there is a difference in acceptability between the left column and the right column.

The man stopped by.	* The Smith stopped by.
* Man stopped by.	Smith stopped by.

The only difference between determiner plus name and determiner plus common count noun is that overt 'the' cannot appear as a determiner before an unmodified name in the singular, unless it is stressed. But the definite article must appear as overt 'the' when it is stressed or when it occurs with a name that is modified or in the plural.

Sloat (1969, 28) proposes that the simplest explanation is that the definite article has a "zero allomorph" (what we have been calling null 'the') and must appear as such before a name in the singular, except when it is stressed or when the name is preceded by a restrictive adjective

or followed by a restrictive relative clause, or unless some other determiner appears overtly.³⁴ These display the relevant cases:

Unmodified singular, no 'the':

(52) I just saw Marc Jacobs.

Stressed article, overt 'the':

(53) I just saw THE Marc Jacobs.

Preceded by a restrictive adjective, overt 'the':

(54) I just saw the famous Marc Jacobs (not my neighbor Marc Jacobs).

Followed by a restrictive relative clause, overt 'the':

(55) I just saw the Marc Jacobs who designs those beautiful handbags (not the Marc Jacobs who works at Google).

In the next section I will argue that Sloat's descriptive generalization is not quite right. My aim is to defend 'The'-Predicativism against Segal's criticism from section 9 by actually giving a "well-motivated account" of the "special rules" that govern when the hidden determiner "can appear on the surface and when it cannot." The main reason to prefer 'The'-Predicativism to 'That'-Predicativism is that the account of the "special rules" in question is well motivated when the hidden determiner is \emptyset_{the} , but not when it is \emptyset_{that} . The main reason to amend Sloat's generalization is that doing so enables us to give a very simple generalization to account for the distribution of \emptyset_{the} to replace his disjunctive one.

10. Amendments to Sloat's Generalization

Sloat described three cases where 'the' would appear overtly in a definite description containing a singular name. The first concerned stressed 'the'. The second and third concerned restrictive modifiers: singular names preceded by restrictive adjectives or followed by restrictive relative clauses would require the definite article to appear as overt 'the'. My aim in this section is to argue for certain amendments to Sloat's descriptive generalization. I have found that if we make the amendments that I pro-

^{34.} This is a fairly direct paraphrase of Sloat (1969, 27).

pose, then we can derive the distribution facts about \mathcal{O}_{the} from a certain very simple syntactic rule. ³⁵

My first amendment to Sloat's generalization concerns his reference to modifiers of the specific grammatical categories *adjective* and *relative clause*. There are restrictive modifiers of other categories that force the definite article to appear overtly with singular names. For example:

- (56) The designer Marc Jacobs is opening a new store.
- (57) The Marc Jacobs in my kitchen is dicing habañeros.

The restrictive modifier 'designer' in (56) could be called an attributive noun. It is not an adjective, but it does require the definite article to be overt. In (57), the restrictive modifier 'in my kitchen' is not a relative clause but rather a prepositional phrase. But it also forces the definite article to be overt. So let's be more general than Sloat was by saying that it is restrictive modifiers coming before or after a singular name that force overt 'the', regardless of their grammatical category.

My second amendment concerns *non*restrictive modifiers. While Sloat thought that restrictive modifiers before a name required an overt definite article, he thought that *non*restrictive modifiers before a singular name required a null definite article. He came to this conclusion on the basis of the following contrast:

- (58) I talked to young Martin about it.
- (59) I talked to the young Martin about it.

He judges that without overt 'the', as in (58), 'young' is unambiguously nonrestrictive—like 'brave' is when we say, "Brave Philip slew the dragon." But Sloat judges the opposite with (59). He judges that 'young' in (59) is unambiguously restrictive—like 'younger' is when we say "The younger Philip slew the dragon." Sloat infers that when a modifier occurs before a singular name in a definite description, a restrictive interpretation requires overt 'the' while a nonrestrictive interpretation prohibits overt 'the'.

I agree with Sloat's judgment about (58): it does have only the nonrestrictive reading. I disagree with Sloat's judgment about (59), how-

^{35.} To my knowledge, Matushansky was the first (and only) person to propose a simple syntactic rule from which Sloat's disjunctive generalization could be derived. The rule I propose differs from Matushansky's; it's simpler in my opinion, and it accounts for more cases.

ever. I think that the sentence is ambiguous: the modifier 'young' can be used nonrestrictively as well as restrictively. I might use 'young' restrictively in (59), to winnow out the nonyoung Martins from the set of Martins containing the one I want to speak about. But I might also use it nonrestrictively, to attribute youth to the Martin that I'm speaking about while saying about him that I talked to him. On this point, I agree with Matushansky (2006b, section 2.1), as against Sloat, but I want to provide a more extended discussion of, and argument for, the point.

There is a straightforward test for the availability of a nonrestrictive interpretation for a given modifier.

Nonrestrictive-Interpretability Test:

If someone who believes that there is only one F can sincerely utter a sentence containing the phrase 'M F', where M is a modifier, then the modifier M can have a nonrestrictive interpretation in that sentence.

The modifier 'young' in (59) passes this test. As long as I do not pronounce (59) with any kind of contrastive intonation, I can sincerely utter it even if I believe that there is only one Martin. I envisage a situation like this: I want to draw attention to Martin's youth because the thing that I talked to him about was a matter involving social subtlety and nuanced emotions, not something easily comprehended by the young. This comes across more easily if we add 'even'.

(60) I was at such a loss what to do, I even talked to the young Martin about it.

There is nothing incoherent in my saying this while believing that there is only one Martin.

Recall that Sloat's combined judgments about (58) and (59) led him to the following generalization.

Sloat's generalization about prename modifiers:

When a singular name is preceded by a modifier, the definite article must appear (i) as null if the modifier is used nonrestrictively, but (ii) as overt 'the' if the modifier is used restrictively.

My dissenting judgment about (59)—that it does have a nonrestrictive reading—leads me to go in for an alternative generalization.

My alternative generalization about prename modifiers:

When a singular name is preceded by a modifier, the definite article must appear as overt 'the' whether the modifier is used restrictively or nonrestrictively.

Both generalizations have counterexamples. We will consider them in turn. Keep in mind, though, that a generalization needn't be rejected entirely just when it has some exceptions. The exceptions might themselves be unifiable in accordance with some principle. The hope would be to hold on to one of the generalizations and countenance the exceptions to it while looking for a supplementary generalization to unify the exceptions. We cannot hold on to both generalizations since they are incompatible with one another. I will argue shortly that Sloat's generalization is the one that has to go. So let's now go through the counterexamples to each of the generalizations.

Sloat's generalization has counterexamples since in at least some sentences, modifiers that occur between a name and overt 'the' do have nonrestrictive readings in addition to their restrictive readings. Any such sentence constitutes an exception to Sloat's generalization about prename modifiers. Let me give some examples:

- (61) The talented Mr. Ripley was a terrific impersonator.
- (62) The ever-popular Marc Jacobs won yet another design award.

The prename modifier in (61) *could* be used restrictively to contrast the talented Mr. Ripley with some different, untalented Mr. Ripley that's a terrible impersonator. But it could also be used nonrestrictively, to attribute talent to the particular Mr. Ripley that's being spoken about—even if it is known that there is just one Mr. Ripley in existence. Likewise with (62). I *might* use the prename modifier restrictively because there is some unpopular Marc Jacobs who's never won an award of any kind. But I might also use it nonrestrictively. It might be that there is just one Marc Jacobs and that I want to draw attention to his enduring popularity while saying about him that he won yet another design award.

Let's avoid the difficult question of what the truth-conditional contribution of nonrestrictive modifiers is and note merely that (59) – (62) are all exceptions to Sloat's generalization about modifiers occurring between a singular name and overt 'the'. In all of these sentences, the modifiers can be interpreted nonrestrictively as well as restrictively.

Meanwhile, there are also clear exceptions to the alternative generalization about prename modifiers. We have already seen such an

exception in Sloat's example (58), 'I talked to young Martin about it', in which a nonrestrictive modifier precedes a singular name but with no overt 'the' (or any other determiner). And there are many modifiers that are like 'young' in this respect. We can call them *null-permissive modifiers*. Null-permissive modifiers permit \emptyset_{the} when occurring before a singular name while being interpreted nonrestrictively. The following phrases illustrate that there are many null-permissive modifiers, witness: *simple Simon*; *poor Aunt Beth*; *lucky Pierre*, *good old John*; *fearless Evel Knievel*; *sweet Georgia Brown*; and *sharp-eyed Éamonn McManus*. ³⁶

It seems to me that 'talented' is a null-permissive modifier but that 'ever-popular' is not.

- (61') Talented Mr. Ripley was a terrific impersonator.
- (62') * Ever-popular Marc Jacobs won yet another design award. 37

And there are other cases like (62')—cases in which the occurrence of a modifier before a singular name requires the definite article to be overt, and yet can be interpreted nonrestrictively as well as restrictively.

- (63) a. The dying John Smith asked to see his ex-wife.
 - b. * Dying John Smith asked to see his ex-wife.
- (64) a. The former Mrs. Smith was ecstatic about her divorce.
 - b. * Former Mrs. Smith was ecstatic about her divorce. 38

We can use the phrase *strict modifier* to classify modifiers like these—ones which prohibit \emptyset_{the} when occurring before a singular name while nevertheless being used nonrestrictively.

- 36. I borrow these examples from Geoffrey Pullum (2006).
- 37. If we pronounce the sentence with "comma intonation," with a pause after 'ever-popular', then it is fine. But in that case, the adjective is not occurring as a modifier of the name, but rather as a preposed appositive phrase, yielding an equivalent to 'Marc Jacobs, ever popular, won yet another design award'.
- 38. Since 'former' is not an intersective modifier, it is somewhat strange to think of it as being used either restrictively or nonrestrictively. One would think that for a modifier M to be used restrictively when combined with a noun F is for the phrase 'MF' to denote the intersection of the Ms and the Fs. But then by that definition, nonintersective modifiers could never be used restrictively. Nevertheless, I think that the distinction between restrictive and nonrestrictive is sufficiently clear in the case of nonintersective adjectives for us not to worry about the oddity of the terminology. There might be a current Mrs. Smith that I want to contrast the former Mrs. Smith with (restrictive). Or I might be making no contrast at all: there may be no current Mrs. Smith and no former Mrs. Smith other than the one being talked about (nonrestrictive).

We now have these categories:

Null-permissive modifiers:

Ones that permit \emptyset_{the} when occurring before a singular name.

Strict modifiers:

Ones that prohibit \emptyset_{the} when occurring before a singular name while simultaneously being interpreted nonrestrictively.

And the situation we are in is this: Strict modifiers, such as 'ever-popular', 'former', and 'dying', provide counterexamples to *Sloat's Generalization about Prename Modifiers*, as stated above. Meanwhile, null-permissive modifiers, such as 'young' and 'brave', provide counterexamples to the *Alternative Generalization about Prename Modifiers*, as stated above. If we want to provide a well-motivated account of the rules that govern when the definite article can appear on the surface and when it cannot, then we should look for simple generalizations. One option would be to jettison both of the above generalizations and cast about for a replacement. But since we seem to be on the right track, it would be better to hold on to one of the generalizations and try to unify the exceptions according to some supplementary principle.

If we do that, then the *Alternative generalization* is the one that stays. To explain why, it helps to introduce a third category of modifiers, which can be called *'the'-permissive*.

'The'-permissive modifiers:

Ones that permit the presence of overt 'the' when occurring before a singular name while still being interpreted nonrestrictively.

The following sentences display that 'brave', 'young', and 'aging' are 'the'-permissive:

- (65) The brave William never shed a tear.
- (66) The young Harry followed in his brother's footsteps.
- (67) The aging Elizabeth retained her stiff upper lip throughout all of the scandals.

Note that 'aging' is like 'dying' in that it cannot occur with \emptyset_{the} . That is to say that both are strict modifiers.

(68) * Aging Elizabeth retained her stiff upper lip throughout all of the scandals.

The point of disagreement, then, between Sloat's generalization and the alternative one boils down to this: according to Sloat's generalization, there are no 'the'-permissive modifiers; according to the alternative, there are no null-permissive modifiers. The reason to reject Sloat's generalization in favor of the alternative is that *every* null-permissive modifier is also 'the'-permissive. Or so I claim. If true, the claim gives us a reason to reject Sloat's generalization about prename modifiers.

Claim:

Every modifier that can occur before a singular name with \mathcal{O}_{the} can also occur with overt 'the' while still being interpreted non-restrictively.

It is difficult to prove a universal when there is no such thing as an arbitrary instance, so I will not try to conclusively demonstrate my claim that every null-permissive modifier is also 'the'-permissive. But let me lend it plausibility by reviewing that every null-permissive modifier that we have looked at so far is also 'the'-permissive.

Null-permissive modifiers:

- (69) Young Martin would be happy to stay young forever.
- (70) Brave Philip slew the dragon with just one blow.
- (71) Sharp-eyed Éamonn McManus noticed the mistake right away. (Pullum 2006)

'The'-permissive modifiers:

- (72) The young Martin would be happy to stay young forever.
- (73) The brave Philip slew the dragon with just one blow.
- (74) The sharp-eyed Éamonn McManus noticed the mistake right away. (Pullum 2006)
- (75) The inimitable Josep wowed the audience with his virtuosity.
- (76) The simmering Bugs Bunny taunted his captor by telling jokes while the broth boiled.
- (77) The infuriated Yosemite Sam jumped up and down in anger.

Strict modifiers:

- (78) * Inimitable Josep wowed the audience with his virtuosity.
- (79) * Simmering Bugs Bunny taunted his captor by telling jokes as the broth heated up.
- (80) * Infuriated Yosemite Sam jumped up and down in anger.

Now since, as I claim, every null-permissive modifier is also 'the'-permissive, every modifier whatsoever constitutes an exception to Sloat's generalization. But the exceptions to the alternative generalization are the modifiers that are null-permissive. Since there are modifiers that are not null-permissive but that can be used nonrestrictively—that is, there are modifiers that are strict—the alternative generalization has but a limited class of exceptions. The hope would be that the limited class of null-permissive modifiers could be unified according to a supplementary general principle.

In the next section I explain how once we incorporate my two amendments, Sloat's descriptive, disjunctive generalization concerning the null definite article can be distilled into one simple principle.

11. Where 'The' Must Be Null

The proposal now on the table is that names *always* occur in predicate position. When one appears not to be in predicate position, it is because it is embedded in a denuded definite description. The rule governing the stripping of overt 'the', as garnered from the last section, is this: The definite article appears as \emptyset_{the} when it occurs with a name, except in any of the following cases, where it appears overtly as 'the':

- (i) The definite article is stressed.
- (ii) The name is preceded by a restrictive or nonrestrictive modifier.³⁹
- (iii) The name is followed by a restrictive modifier.

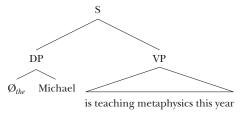
Sloat's 'adjective' and 'relative clause' have here been replaced with the more inclusive term 'modifier'.

The question now arises whether we can dispense with our disjunctive version of the generalization concerning \emptyset_{the} in English and provide a simpler generalization of the rule. It turns out that one clearly emerges when we look at the syntactic structures associated with the cases subsumed under the rule. First look at cases where the definite article is required to be null.

^{39.} We should keep in mind that null-permissive modifiers are exceptions to the part of this rule that governs nonrestrictive modifiers. I am optimistic that some tidy way of circumscribing the null-permissive modifiers will be discovered.

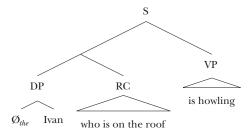
The Basic Case:

(81) Michael is teaching metaphysics this year.



The Name Is Followed by a Nonrestrictive Modifier (here a relative clause):

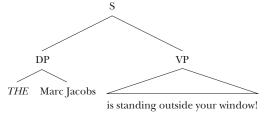
(82) Ivan, who is on the roof, is howling. (I don't know why he's on the roof.)



Next look at structures where the definite article is required to be overt.

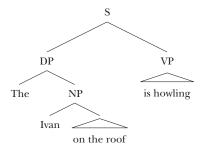
The Definite Article Is Stressed

(83) THE Marc Jacobs is standing outside your window! (You mean it's not my neighbor Marc Jacobs?!)



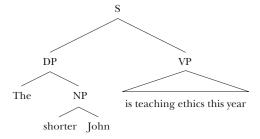
The Name Is Followed by a Restrictive Modifier (here a prepositional phrase):

(84) The Ivan on the roof is howling.
(But the Ivan downstairs is passed out.)



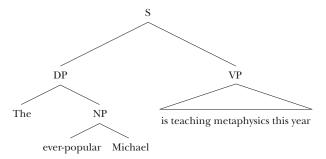
The Name Is Preceded by a Restrictive Modifier

(85) The shorter John is teaching ethics this year. (The taller one is teaching logic.)



The Name Is Preceded by a Nonrestrictive Modifier

(86) The ever-popular Michael is teaching metaphysics this year. (His clarity and kindness are what make him so popular.)



There is a general principle that covers all cases where the definite article must be realized as \emptyset_{the} , namely, whenever it has a name as its sister, unless it is stressed. The 'the'-predicativist has a straightforward explanation for why the definite article is pronounced when stressed in cases where it would otherwise not be grammatical: one cannot stress a word without pronouncing it!

Where \mathcal{O}_{the} : The definite article must appear as \mathcal{O}_{the} when it has a name as its sister, unless it is stressed. ⁴⁰

One could think of this as a kind of obligatory contraction: when nothing occurs "between" the definite article and a name, they get smushed together, resulting in an unpronounced definite article (discounting those cases in which the article is stressed for emphasis). One way for a word or phrase to get between the definite article and a name is to be linearly between them, as in (62), 'The ever-popular Michael is teaching metaphysics this year'. But linear adjacency of the definite article and the singular name is not a sufficient condition for contraction. A branching node that dominates the name but not the definite article also gets "between" them in the sense that's relevant for blocking contraction, as in (84), '[The [Ivan [on the roof]]] is howling'.

So what, now, is our analysis of the difference between the interaction of names with the definite article and that of common count nouns with the definite article?

The man stopped by.	* The Smith stopped by.
* Man stopped by.	Smith stopped by.

The difference displayed here can be derived from the following principles.

40. Matushansky (2006a, 2006b) accounts for the appearance of overt 'the' with names by proposing a particular rule of "head movement," which she dubs "m-merger," in which a name in a definite description raises and adjoins to the definite article if it is close enough to it, in a certain well-defined sense. The name and the article in that case "merge" morphologically. In English, she proposes, this morphological merger leads to an unpronounced definite article. In contrast, in Catalan (among other languages), m-merger leads to the definite article's being pronounced differently than it would be otherwise, as a special "preproprial definite article" (Matushansky 2006b, sec. 4). My objection to Matushansky's specific proposal is that it doesn't account for the fact that the definite article cannot appear as null when a name is followed by a restrictive modifier, as in our case above, 'The Ivan on the roof is howling', since in that case the name and the definite article are close enough to each other, in the specified sense. For her proposal to be adequate, the prepositional phrase 'on the roof' must intervene between 'the' and 'Ivan' at the level at which m-merger takes place. My proposal does not depend on there being any particular kind of movement.

- 1. Singular count nouns cannot occur bare in an argument position, but when they appear to do so they occupy the predicate position of a denuded definite description. (section 4)
- 2. Names are count nouns. (section 1)
- **3.** The definite article must be null just when it is unstressed or has a singular name as its sister. (section 11)

12. The Import of the Syntactic Evidence for \emptyset_{the}

Let me sum up the arguments and conclusions from the preceding four sections (sections 8–11). The main point to be highlighted is this. The existence of the null definite article has been confirmed by a number of syntactic facts that are entirely independent of concerns for a unified compositional semantics for names.

Sloat's chart, which displays how names and common count nouns interact with overt determiners, demonstrates that not only can the overt definite article show up with singular names, it is completely predictable which environments do not tolerate an overt definite article and which ones require a definite article to appear overtly. The definite article must appear overtly with singular names when it stressed, when the name is preceded by a restrictive or nonrestrictive modifier (but for some exceptions discussed in section 10), or when the name is followed by a restrictive modifier; otherwise it is required to be null. Segal (2001, 561) had noted that if 'The'-Predicativism were to be plausible, it needed a "wellmotivated account" of the "special rules" governing when the definite article "can appear on the surface and when it cannot." Sloat's chart, in virtue of its well-organized and comprehensive presentation, cleared the way for the aforementioned disjunctive description of these special rules. This all satisfies Segal's requirement that there be an account of the "special rules" in question.

Furthermore, with my two amendments to Sloat's descriptive generalization, for which I gave extended arguments in section 10, I was able to formulate a very simple syntactic rule to capture the generalization and so replace Sloat's disjunctive characterization with a far simpler one, in section 11:

Where \emptyset_{the} : The definite article must appear as \emptyset_{the} when it has a name as its sister, unless it is stressed.

Here I leaned heavily on the work of Matushansky (2006b), but proposed a different, and simpler, syntactic rule from the one that she proposed, which she calls *m-merger* (2006a, 2006b). Note that we find further evidence for the existence of a null definite article in the facts that (i) it may always be pronounced when it is stressed (you cannot stress a word without pronouncing it) and (ii) a number of languages permit pronunciation of the definite article as it occurs with unmodified singular names. Matushansky (2006b, 2008) provides an excellent discussion of the crosslinguistic facts. All of this satisfies Segal's further requirement that the account of the "special rules" be *well motivated*.

Moreover, the proposed account of the distribution of overt 'the' with singular names cannot be appropriated either by referentialists or even by 'that'-predicativists.

The account cannot be appropriated by referentialists since it posits that when a singular name appears bare (without a determiner), it is really embedded in a denuded definite description. Thus if the solution is right, then names *never* occur in an argument position, only ever in a predicate position.

And the account cannot be appropriated by 'that'-predicativists since accounting for Sloat's distribution patterns requires that the null determiner occurring with apparently bare singular names be the null definite article; a null 'that' or 'this' provides no explanation for the occasional appearance of 'the' with singular names.

So not only does Predicativism provide for a unified semantics for names, on its best version, 'The'-Predicativism, it provides for a simple explanation of what on the referentialist or 'that'-predicativist view is a thoroughly puzzling fact: the regular and predictable distribution of the overt definite article with singular names. The denuded definite descriptions theory of apparently bare, unmodified singular names is not merely semantically motivated, but also explanatorily powerful from a syntactic point of view. And in that respect, it proves superior to its main rivals.

13. Rigidity and Incompleteness? Not Problems for 'The'-Predicativism

Kripke taught us that names are rigid designators, at least in the very (!) restricted class of cases when they appear as bare unmodified singulars in argument position. A name is "a *rigid designator* if in every possible world it designates the same object" (Kripke 1980 [1972], 48). Kripke was concerned to argue against a view he attributed to Frege—that (i) the sense of a name is some substantial description believed by users of the name to

apply uniquely to its referent, and (ii) the referent of a name is whatever object uniquely satisfies that description. Kripke took it to be a consequence of this view that if a name were to be replaced in a sentence with the description that gave it its sense, then the two sentences would have the same modal profile (be true in just the same possible worlds). ⁴¹

Kripke's point was that if the truth-conditional contribution of a name were identified with that of some substantive description believed by speakers to hold of the name's referent, then if that description didn't express an essential property of that referent, then names would not be rigid designators. For example, if the sense of the name 'Aristotle' could be expressed as the last great philosopher of antiquity, then according to Kripke's Frege, the sentence 'Aristotle was illiterate' would have the same truth conditions as the sentence 'The last great philosopher of antiquity was illiterate'. But these sentences do not have the same truth conditions. If Aristotle had been born into slavery and so never had become literate, and Plato had been the last great philosopher of antiquity, then the sentence 'Aristotle was illiterate' would be true while the sentence 'The last great philosopher of antiquity was illiterate' would be false.

Meanwhile, Kripke convinced us that the descriptions that name users associate with names don't typically apply essentially to individuals (and often do not even apply uniquely to any individual at all). Thus Frege's theory of sense, given Kripke's interpretation of it, is wrong.

This argument against Frege's theory of sense has come to be called *the modal argument*: if the sense of a name were identified with that of some substantive description that applied only contingently to the referent of that name, then sentences in which the name occurred would not have the truth conditions that they in fact have. The import of this issue for us is that since *being called Aristotle* is an accidental property of Aristotle's (he might have been called Alcibiador), we should worry that the description 'the *x* such that *x* is called Aristotle' does not rigidly designate Aristotle. Therefore, this argument against 'The'-Predicativism would go, since 'Aristotle' is a rigid designator, it cannot make the same semantic contribution to sentences as does the description 'the *x* such that *x* is called Aristotle'.

^{41.} I am going to stick to the old-fashioned practice of reserving the preposition 'in' for worlds and contexts ('true in a world, in a context', 'designates o in a world, in a context', and so forth) and the preposition 'at' for times ('true at a time', 'designates at a time', and so forth).

Rigidity and the Being-Called Condition

So 'the'-predicativists who agree with Kripke's view about the truth conditions of modal claims involving names have to reconcile the following theses:

- a. 'Aristotle' is a multiply applicable predicate that applies contingently to a thing just in case it is called Aristotle.
- b. When 'Aristotle' appears as a bare singular in argument position, the name occurs as the sister of an unpronounced definite article \emptyset_{the} .
- c. The unpronounced definite article has the same meaning as the definite article that is overtly realized as 'the'.
- d. When the name 'Aristotle' appears as a bare singular in argument position, it functions as a rigid designator in Kripke's sense.

It follows from the first three of these that when the name 'Aristotle' appears as a bare singular in an argument position, the sentence containing it is semantically the same as one containing the incomplete definite description 'the Aristotle' put in place of the name 'Aristotle'.

Together with the fourth of these theses, it follows that the incomplete definite description 'The Aristotle' is a rigid designator. This is precisely what 'the'-predicativists must maintain. But can this be maintained without being ad hoc? The answer is "yes." Incomplete definite descriptions in general are rigid designators. For convenience, we will call this *the rigidity thesis*.

Incomplete Definite Descriptions Are Rigid Designators

Begin by considering a sentence with the incomplete description 'the party':

(87) Olga enjoyed the party.

We will shortly contrast this with a modal variant:

(88) Olga might have enjoyed the party.

If you were to sincerely utter (87), you would be talking about some one particular party—call it BASH—and saying of *it* that Olga enjoyed it. Suppose that the utterance is true: that Olga did in fact enjoy BASH. Someone who overhears your utterance of (87) might well not know what party you are talking about. If he asks you, "what party are

you talking about?" you might say, "Naomi's fortieth birthday party." Or you might equally satisfyingly respond by saying "the party I went to last night." Since your aim is to enable your audience to know which of the many parties that happened last night is the one that you are talking about, it is appropriate to give any answer that will adequately convey to your audience which party it is that you are talking about. Nothing in such exchanges requires that there be some one particular completing description that enters into the proposition expressed by your original utterance of (87). ⁴² When you use the incomplete description 'the party', you use it to talk about a particular party, to say something about *it*—as opposed to whatever party is the so-and-so (as Donnellan 1966 might have put it), where "is the so-and-so" is supposed to stand in for some particular completing description recovered from the context.

According to Russell's theory of descriptions (1905, 1919), a simple sentence such as (87) will be true only if the predicate in its definite description, 'party', applies to just one event. But there are always many parties going on; the utterance is nevertheless true. Looked at the other way: since there is always more than one party going on, a brute application of Russell's theory yields that (87) is false, even though BASH, the party being talked about, was in fact enjoyed by Olga.

Those who wish to maintain Russell's theory of descriptions, despite the rampant use of incomplete descriptions, have four choices. One: cling to the falsity of the envisaged utterance of (87) and explain why we think it's true. Two: accept that utterance as true and explain how the incomplete description is in fact a complete one. Three: give up bivalence for meaningful utterances. Four: say that the utterance is not meaningful.

Those in the second camp, "the contextual completers," must provide that the incomplete definite description 'the party' is associated with a complete definite description—the one to which Russell's theory is to apply. An example could be 'the party I went to last night'. The association with that complete description must be tight enough so that applying the theory to the complete description just is applying it to the original description, which must therefore have merely appeared to be incomplete.

^{42.} On this point, I agree with Kripke (1977) and David Lewis (1979 [1983]) and disagree with Nathan Salmon (1982), Stephen Neale (1990), and Jason Stanley and Zoltán Szabó (2000).

Let's suppose (for the sake of argument) that the complete description to be associated with 'the party' is the complete one just singled out, namely, 'the party I went to last night'. Two different types of association have been proposed.

The first is *ellipsis*: one uses the incomplete description just as shorthand for the complete description (in a sense of "shorthand" that needs explaining); the sentence uttered is the very same one that would have been uttered if the speaker had spelled everything out.⁴³

The second type of association is by *contextual completion*. One way to implement this idea would be to say that the noun 'party' has a restrictive variable syntactically attached to it, representable as 'party $_F$ '. ⁴⁴ In this case the variable 'F' would be contextually assigned a property to be intersected with the property of being a party. In our case, 'F' could be assigned the property of *being an event that I went to last night*.

Yet a third sort of treatment would be to render the definite description complete in the context in which it's uttered by allowing the sentence to be evaluated in a restricted domain—the domain of the context. If the things being quantified over are restricted so as to exclude all parties except for any that I went to last night, then the description "the party" will be complete in its context, since I did not go to more than one party last night. I would not consider this proposal further, however; it is not viable because it cannot accommodate mixed-domain sentences like these:

- (89) The dog got in a fight with another dog (McCawley 1979).
- (90) Everyone is asleep and is being monitored by a research assistant (Soames 1986).
- (91) Nobody cared that nobody came (Stanley and Williamson 1995).

But now return to our modal variant.

(88) Olga might have enjoyed the party.

According to both the ellipsis and contextual-completion proposals, that sentence would have the same truth conditions as this one:

(88') Olga might have enjoyed the party that I went to last night.

^{43.} See Wilfrid Sellars (1954) for support of the ellipsis proposal. But also see Strawson (1954) and Stanley (2002a) for dissent.

^{44.} See Stanley and Szabó (2000) and Stanley (2002b) for this sort of treatment.

Given the standard view that the definite description can take narrow as well as wide scope with respect to the modal 'might', (88') would be ambiguous because it would have two scope readings:

- (88^{\prime}_{N}) This might have been: Olga enjoyed the party that I went to last night.
- (88 $\frac{1}{W}$) The party that I went to last night is an x such that this might have been: Olga enjoyed x.

But (88) does not have both of these scope readings. It only has the wide-scope reading represented in $(88'_W)$.

The original sentence, (88), is true just in case there is a possible world in which Olga enjoyed BASH, whether or not I went to BASH in that world. It is irrelevant that there are possible worlds in which I went to some *different* party last night that was enjoyed by Olga. In other words, (88) has only the truth conditions that it would have if the incomplete definite description were rigid. Since incomplete definite descriptions such as 'the table' or 'the party' can be used to talk about different tables or parties on different occasions, it is right to say that these definite descriptions are *rigid-in-a-context*.

The same holds for other modal sentences like (88):

- (92) The party might have been fun.

 (True if there is a possible world in which BASH was fun—whether or not I went to BASH in that world.)
- (93) More people might have gone to the party.

 (True if there is a possible world in which more people went to BASH than in fact went—whether or not I went to BASH in that world.)
- (94) I might not have gone to the party.

 (True if there is a possible world in which I did not go to BASH, even if I would have gone to some other party had I not gone to BASH.)
- (95) If Noah's birthday had been yesterday, then I wouldn't have gone to the party.

 (True since if Noah's birthday had been yesterday, then I wouldn't have gone to BASH but rather to Noah's party since I prefer Saturdaynight parties to Sunday-night ones.)

So in the face of incomplete definite descriptions, proponents of Russell's theory face a problem: how to provide that incomplete descriptions are made complete by the point at which Russell's analysis applies. Moreover, it is not just Russellians who face this problem. Russellians face the

problem as a potential counterexample to their theory. But all theorists of descriptions face the problem as data to be accommodated by their theory.

I said in section 4 that I had no intention of providing an analysis of every construction in which names occur. For example, I said that I would not venture an analysis of the bare-plural constructions in which names and common count nouns both occur. Rather, I confined myself to the claim that whatever the right analysis is of the bare-plural construction in (34a) it is also the right analysis of (34b). I called this piggybacking.

(34) a. Bears from the north are usually scary.

b. Sarahs from \emptyset_{the} Alaska are usually scary.

Likewise, whatever the right analysis is of donkey anaphora with a common noun, as in (38a), it is also the right analysis of donkey anaphora with a name (38b).

(38) a. Every woman who owns a donkey beats it. b. Every woman who knows an Agatha loves her.

Piggybacking allows 'the'-predicativists to develop a theory of names without having to theorize about every problematic construction in which a name occurs. Piggybacking allows us to proffer a theory that can be assessed even while we don't have a comprehensive theory of every problematic construction. Piggybacking can make work easier.

But is there really license to piggyback here, in the case of the rigidity of incomplete descriptions? We are granted such a license only if denuded definite descriptions with names are in fact incomplete in the relevant sense. But while most names have more than one bearer, this needn't have been true. And who knows? It might well not be true tomorrow. Suppose the name 'Kivlighan' has exactly one bearer, then ' \mathcal{O}_{the} Kivlighan' is *not* an incomplete definite description in the usual sense. So does this mean that some denuded descriptions with names cannot be argued to be rigid in the present way?

I say no since the situation is the same with books and tables. I say that the definite descriptions in (96) are both rigid.

(96) The book is on the table.

Here's an example to illustrate the point. Suppose I've been looking around for the book that I've been reading. You utter (96) in order to

let me know that the book is on the table. Suppose I then wonder whether the book would have been on the table if there had been a tornado, say. What I want to know is whether b might not have been on t if there had been a tornado, where b is the particular copy of Herzog that I was looking for and t is the particular table that you informed me it was on. It's irrelevant that I would have been reading some different book if there had been a tornado, say, The Wonderful Wizard of Oz. And the following is true, but also irrelevant: if there had been a tornado, not only would I have been reading The Wonderful Wizard of Oz, I would have been looking for it, having absent-mindedly left it on the table. In that case this is true:

(97) If there had been a tornado, then the book I would have been reading would have been on the table.

But as long as the tornado world is not one in which *b* is on *t*, this is true:

(98) If there had been a tornado, then the book would not have been on the table.

The reason (98) is true is that if there had been a tornado, *Herzog* (my copy of it) would not have been on the table, it would have been on the shelf since I'd have been reading a different book. ⁴⁵ Meanwhile, if there had been a tornado, there would be a book on a table. And it would have been one that I was both reading and looking for. But still, for all that, (98) is true.

But nothing in what I've just said presupposes that there are other books in the world. While we do tend to assume that there are many tables and books in the world, if there are any at all, our utterances would not have a different meaning if that assumption about the world turned out to be wrong. If incomplete definite descriptions as such were grammatically different from complete ones as such then, as Christopher Gauker (1997) has forcefully argued, the grammar of 'the book is on the table' would change between today and tomorrow if every book other than the ones being talked about today were destroyed in the night. But it does not. The incomplete descriptions in 'the book is on the table' would be rigid even if, incredibly but unbeknownst to the speaker, there were no books or tables other than the ones he was talking about.

The upshot is that there is no onus on me to provide an explanation of how or why incomplete descriptions are rigid designators. That

^{45.} I'm leaving out explicit relativization to utterances of the sentence and contexts of utterances, which I would put in if I were being more precise.

is the right of the piggybacker. I don't have to take a stand, for example, on what the mechanism is that renders incomplete definite descriptions rigid—on whether, for example, rigidity requires a covert 'actually' operator or whether, alternatively, there is more than one definite article for a speaker to use, one that's more Russell-like and one that's more demonstrative-like, according as it matters to the speaker whether his descriptive material applies uniquely or not. ⁴⁶ I may content myself with the claim that whatever the semantics for incomplete definite descriptions is, and whatever the mechanism is that renders them rigid, denuded incomplete definite descriptions with names will follow suit.

That said, there are many complications in the rigidity thesis that incomplete definite descriptions are rigid designators. I won't seriously investigate these here, but will instead just make some gestures regarding three of them.

Relational Predicates: Some definite descriptions containing relational predicates such as 'the murderer', 'the president', 'the mother' appear to be incomplete since there are many murderers, presidents, and mothers in the world. I would propose that these definite descriptions merely appear to be incomplete. As relational predicates, they have a hidden contextual variable: [murderer OF x], [president OF y], [mother OF z]. Since each variable is assigned a value in context, the definite descriptions in question are in fact complete, relative to a cooperating context.

Role-Type Incomplete Definite Descriptions: Kent Bach (2004) has pointed out that incomplete definite descriptions are not always used to refer, and therefore not always used to refer rigidly. Here are two of his examples.⁴⁷

- (99) The rental car should have four doors.
- (100) The party should have excellent wine.

In neither sentence are we using the incomplete definite description to talk about any particular thing. Rather, we are stating a condition that any rental car, or party, must meet if it is to be the one that we decide to rent, or to go to.

Borrowing a helpful term from Daniel Rothschild (2007), we can call these *role-type* incomplete descriptions. Rothschild makes a distinc-

^{46.} Larson and Segal (1995) consider this latter idea.

^{47.} These examples were communicated to me personally.

tion between role-type descriptions and "particularized" ones. Role-type descriptions are those for which it is presupposed that they will have just one object that satisfies them, if any at all. To satisfy the description is to be the one to play a certain *role*.

Rothschild's distinction is pragmatic insofar as whether a description is role-type or not can vary depending on what presuppositions are in force in a conversation—that is, what propositions its participants are jointly taking for granted for the purposes of that conversation.

The reason that 'the rental car' and 'the party' can be used nonrigidly in (99) and (100) is that they are being used as role-type descriptions that do not yet denote anything at all; we are *deciding* which things are going to fill the role and are invoking various criteria.

Contrast (96), 'the book is on the table', with (101), which is more like Bach's two examples.

(101) The book should be on the table.

Is 'the book' in (101) a rigid incomplete definite description or not? I believe that it is not rigid if we're in a situation where we're using 'the book' as a role-type definite description, which would be analogous to the intended reading of Bach's sentence (100). The situation could be one like this. We are at the bookstore buying a gift for a friend. We know that we're going to buy a book, but just *one*. Suppose there's a table that has the sale books on it. Given that you and I have agreed in advance that we want to get a nice book but not spend a lot of money on it, one of us suggests, by uttering (101), that being on the sale table be a necessary condition for being the book we end up deciding to buy.

But contrast this with a situation in which the definite description 'the book' is not being used as a role-type description. In such a situation we would be using the definite description 'the book' rigidly, to refer to our copy of 'Herzog', say, and saying of *it* that it is likely to be on the table (or expected to be and so forth).

Names exhibit a similar phenomenon.

(102) Una should have been your first daughter. 48

48. That is based on an example due to Irene Heim, personally communicated to Paul Elbourne. See Elbourne (2005, 182).

If John had had five sons, Quintus would have been bullied by the others. (In John's community, there is a convention of naming your fifth son Quintus.)

If we imagine this as said to parents who are considering whether to give their second daughter the name 'Una', then we are using the name as a "role-type" description, analogous to the description 'the party' in the intended reading of Bach's sentence (100) and the description 'the book' in the first described reading of (101).

Covarying Incomplete Definite Descriptions: We sometimes have incomplete definite descriptions that are not used to designate any individual at all, rigidly or otherwise, but rather have a denotation that varies in coordination with an antecedent.

(103) If Carlos meets a scientist and decides to marry her, then his current wife will stalk the scientist and try to kill her.

The definite description 'the scientist' here is acting something like a variable that's "bound" by the antecedent indefinite description 'a scientist'. (I put "bound" in quotes, since binding may well not be the right way to account for this sort of covariance.)

But we also see such covarying uses of names. Recall these from note 22:

- (104) If a child is christened 'Bambi', and Disney Inc. hear about it, then they will sue Bambi's parents. (Geurts 1997, 321)
- (105) If John insists on calling his next son Gerontius, then his wife will be annoyed and Gerontius will get made fun of because of his name. (Elbourne 2005, 182)

The names in the second clauses of these sentences do not designate any one particular thing. In fact, they're acting just like the "bound" incomplete definite description in (103) above. So here, the nonrigid occurrences of the names in (104) and (105) display just the sort of nonrigid covariance that we see with the incomplete definite description in (103). Again, piggybacking allows us to defer accounting for covarying occurrences of names. Covarying occurrences of names are just a special case of the more general phenomenon of covarying occurrences of incomplete definite descriptions.

The conclusion of these three brief discussions about nonrigid incomplete definite descriptions is that the rigidity thesis requires qualification: names are rigid in just those environments in which incomplete definite descriptions would be.

Names Are Incomplete

Let's review the situation we're now in. We worried that the rigidity of names might falsify 'The'-Predicativism since things have their names only contingently. Since things only contingently have the names that they in fact have, it looked like an incomplete denuded definite description such as ' \emptyset_{the} Aristotle' could not be rigid. Aristotle Onassis might not have been given the name 'Aristotle', and therefore might not have been in the extension of that name. This would be a problem for 'the'-predicativists, since on our view a sentence with a singular, bare occurrence of a name 'N' appearing in argument position is semantically equivalent to the corresponding sentence with a denuded incomplete definite description ' \emptyset_{the} N' in the same position. In the face of this problem, we noted that incomplete definite descriptions are in general rigid. It is therefore not ad hoc to posit that incomplete (denuded) descriptions like ' \emptyset_{the} Aristotle' are rigid.

What we did, therefore, was show that a certain property of names, namely, their rigidity, is one that we would expect names to have if 'The'-Predicativism were true. This argument took this form: names are known to have a certain property; incomplete definite descriptions have that property too; therefore, the fact that names have that property is no problem for 'The'-Predicativism.

Now we'll see an argument that works in the opposition direction, one that has this form: incomplete definite descriptions are known to have a certain property; names have that property too; therefore, the fact that incomplete definite descriptions have that property is no problem for 'The'-Predicativism.

The property in question is *incompleteness*. As normally understood, *incompleteness* is something that by definition applies only to definite descriptions: a definite description 'the F' is incomplete just in case its embedded predicate 'F' is true of more than one thing. Of course if every occurrence of a name 'N' appearing in argument position is semantically equivalent to a definite description ' \mathcal{O}_{the} N', then since most names that are used to talk about a particular individual are borne by more than one individual, the definite description ' \mathcal{O}_{the} N' will be incomplete. Given such a circumscribed understanding of what incompleteness amounts to, it could make sense to say that a name is "incomplete" only by someone who thought that 'The'-Predicativism was true. So if the incompleteness of names in argument position is to form part of the evidence for 'The'-Predicativism, some more inclusive understanding of incompleteness—

one that applies to names in argument position—is required. So let us say this:

NP-Incompleteness: A noun phrase 'NP' appearing in argument position is incomplete when, although it is used to talk about a particular individual, it wouldn't be inappropriate to ask of the speaker, "which NP are you talking about?" in order to know what was said. Either that, or one could legitimately have taken the speaker to have been talking about something other than what he or she was in fact talking about. 49

It is not difficult to see that in that sense, names may be incomplete just as definite descriptions may be.

- (106) A: Did you bring the book back to the library?
 - B: Which book are you talking about?
 - A: The Lemony Snicket book you were reading.
- (107) A: Aristotle engaged in unethical business practices as a young man.
 - B: Which Aristotle are you talking about?
 - A: Aristotle Onassis, of course.
- (108) A: I had a lot of fun at the party.
 - B: Really?! I thought that Noah's party would be a total bore.
 - A: No, I'm talking about Naomi's party.
- (109) Rewind thirty years.
 - A: Saul is writing a new book.
 - B: What?! Saul Kripke is writing a new book?
 - A: No, I'm talking about the Saul who wrote *Herzog*.

So what's going here? If names appearing in argument positions are rigid designators, how could the names 'Aristotle' or 'Saul', when they occur in argument positions in these sentences, designate more than one individual? If names in these sentences designate the same individual in every possible world, how could they designate more than one individual in the actual world? Obviously, the names 'Aristotle' and 'Saul' designate more than one individual in the actual world in the sense that there is more than one person in the actual world who is called Aristotle and more

^{49.} This second disjunct of the definition serves to accommodate David Kaplan's (1990) idea that no two people can have the very same name, even when those names sound just alike and are spelled in just the same way. Aristotle Onassis and Aristotle the philosopher have different "common currency names" (a phrase coined by Kaplan), but they are different instances of the same "generic name."

than one person in the actual world who is called Saul. Kripke's claim that the names 'Aristotle' and 'Saul' are rigid designators must be understood so as not to be falsified by this fact. Kripke's claim is about bare singular unmodified names appearing in argument position. To say that these names are rigid designators, then, must be to say that once their denotation is determined, in a context, to be some particular individual, then the name, as used in that context, designates that same individual in each possible world. This can be put in terms of truth conditions for modal attributions containing that name, as used in a context. For example, if a speaker in a context uses the name 'Aristotle' to designate an individual o (Onassis), when uttering 'Aristotle might have been a Lothario', then the name 'Aristotle', as used in that context, will be "rigid" in the sense that the utterance will be true just in case there's a possible world in which o is a Lothario. And it can also be put in terms of the modal profile of the "simple" sentence 'Aristotle is a Lothario'. (For discussion of that latter point, see the preface to the 1980 edition of Naming and Necessity.)

So names are rigid-in-a-context. Recall that we were led to say exactly that about incomplete definite descriptions. Despite this, they are *NP*-incomplete. Likewise, incomplete definite descriptions and, a fortiori, incomplete definite descriptions that embed unmodified singular names, are rigid-in-a-context as well as being *NP*-incomplete.

Our conclusions for this section are, then, that (i) incomplete definite descriptions that embed unmodified singular names are rigid-in-a-context, so the fact that names in argument position are rigid-in-a-context is consistent with their being semantically equivalent to incomplete definite descriptions that embed unmodified singular names, and (ii) names are *NP*-incomplete, so the fact that definite descriptions that embed unmodified singular names are *NP*-incomplete is consistent with their being semantically equivalent to names in argument position.

14. Some Methodological Remarks

There is more than one kind of count noun; there are names and there are common count nouns. I use the terms "name" and "common noun" mutually exclusively because they have different syntactic properties. Their distribution with the *overt* and *covert* definite articles distinguishes them. This is on a par with saying that there is more than one kind of common noun; there are common count nouns and there are common mass nouns. *Their* pluralizability and distribution with determiners distinguishes *them*. So, for example, these sentences are grammatical: 'Cats

are the bane of my existence' and 'A cat is on the roof.' But these are not: 'Furnitures are the bane of my existence' and 'A furniture is on the roof.'

A key thesis of 'The'-Predicativism is the *Denuded Definite Description Thesis*. The denuded definite description thesis allows for names to have the semantic value of a predicate in all of their occurrences and to be grammatically categorized as a kind of count noun. The denuded definite description thesis also enables formulation of a simple rule that accounts for the surprising distribution pattern of names with ' \mathcal{O}_{the} '. The pattern is that the definite article, unless it is stressed, must be realized as ' \mathcal{O}_{the} ' with a singular name unless the name is either preceded by a restrictive or nonrestrictive modifier or followed by a restrictive modifier.

Denuded Definite Description Thesis: Names constitute the nominal component of denuded definite descriptions when they appear as bare singulars in argument position.

Moreover, the denuded definite description thesis affords a neat and simple syntactic generalization to cover the puzzling distribution pattern, namely, that the definite article must be realized as \mathcal{O}_{the} when it has a name as its sister, unless it is stressed.

Where \mathcal{O}_{the} : The definite article must be realized as \mathcal{O}_{the} when it has a name as its sister, unless it is stressed.

This gives perhaps the best support for 'The'-Predicativism (as against its 'that' cousin as well as Referentialism). It yields a simple explanation of the distribution of names with the overt definite article 'the'. Predicativism also has the advantage of *uniformity*: it assigns the same predicate-type semantic value to seemingly bare singular names that it assigns to names that are clearly in a predicate position.

Some authors, both for and against, suggest that a "uniformity argument" is one of the best arguments that has been given (or perhaps can be given) for Predicativism.⁵⁰ In light of that, it is worth explicitly saying something that probably everyone realizes anyway, namely, that uniformity is not advantageous per se. Uniformity is advantageous just to the extent that it provides for theoretical simplicity along with empirical adequacy.

^{50.} See, for example, Burge (1973, 430), Elugardo (2002, sec. 2), Robin Jeshion (forthcoming a, forthcoming b), Kroll (n.d.), Leckie (2013, secs. 1–2), Rami (2014), and Sawyer (2010, 207).

We have two competing theories of names. One of them is nonuniform in maintaining that when names occur as bare singulars in argument position, they are referring expressions but when they occur with determiners, or in the plural, they are predicates. The other theory is uniform in the sense that it assigns a predicative value to a word wherever it occurs as a name. These facts alone do not provide support for one theory over the other. The nonuniform theory of names might well provide for an overall simpler semantic theory than its uniform rival. For example, if there were other types of expressions that seemed to have a semantic variation that's similar to the one that names seem to have, then the simplest theory might well be one that allows for variation in both types of expression while explaining that variation with a single, productive principle. Gail Leckie (2013) has argued that a polysemous theory of names is in fact simpler than a uniform theory for just this reason. She has argued that a more general account of other semantic-shift phenomena would yield an explanation of the semantic shift that's posited by the nonuniform polysemous view. In particular, she invokes the polysemy that we see with botanical names, for example, with 'walnut' being used for a nut, for the kind of tree that produces that nut, or even for a particular individual tree of that kind. Leckie argues that a theory that accounts for that phenomenon could simultaneously account for the polysemy that she proposes for names. That is exactly the right sort of counterargument to the predicativists' claim that uniformity is a good feature of their theory of names.

Robin Jeshion (forthcoming a), in contrast, has argued that predicativists cherry-pick those occurrences of names that justify their own claim for uniformity by discounting those predicative uses of names that do not conform to the being-called condition. For example, at our Halloween party, we say that many of our guests are Obamas but fewer of them are Abe Lincolns, even though those Obamas and Lincolns do not have 'Obama' or 'Abe Lincoln' as a name. So we predicativists cannot claim, the objection goes, to have genuine concerns for uniformity, she argues. We arbitrarily, and therefore unjustifiably, choose to ignore such uses when claiming uniformity for our own view. The point is well taken. But it is not apropos. We predicativists believe that our choice about which occurrences of names are the ones to be unified is the theoretically virtuous choice insofar as—but only insofar as—that choice provides for an overall simpler semantic theory.

Just as 'Obama' can be used as a predicate true of people who have 'Obama' as a name as well as true of people in an Obama costume, the

common noun 'witch' can be used as a predicate that's true of witches as well as one that's true of people in a witch costume. (There were three witches and four ghosts at our Halloween party, but only one black cat.) Those cases where a name occurs in predicate position but is not used so as to apply to things that are bearers of that name get just the same treatment as cases where a common noun occurs in predicate position but is not used with *its* standard application conditions.

The aim of uniformity actually plays two roles in my own development and defense of Predicativism. On the one hand, the goal of uniformity plays a causal role in my adopting the theory that I have in fact adopted. On the other hand, the ultimate defense of the theory that I advocate relies on a claim for comparative simplicity that itself results from unifying the particular occurrences of names that I have chosen to unify.

Let me illustrate the distinction with a storied example. In 1865 August Kekulé proposed that the benzene molecule consisted of a ring of six carbon atoms with alternating double and single bonds, each bonded to one hydrogen atom. The structure of the molecule had eluded chemists for many years before Kekulé's discovery. Kekulé claimed that he came to this hypothesis after having a daydream of a snake chasing its own tail. The daydream was what led him to the hypothesis, but was not considered evidence in favor of the hypothesis.

A theorist in any discipline might be led to develop a theory for any number of reasons. Those reasons need not form any part of an ultimate defense of the theory. One scientist might develop a particular theory because he heard voices in his head telling him to do so. His having heard those voices would not later be invoked in defense of the theory (unless perhaps the voices in his head had tended to be correct in the past). Another scientist might develop a particular theory based on a hunch. He trusted his hunches because they'd worked for him in the past. The fact that he had those hunches would not ultimately be involved in defense of the theory.

Yet a third scientist might develop a particular theory because it unified certain phenomena and he had a hunch that the unification of those particular phenomena would ultimately provide for a theory that was simpler overall than its competitors. The hunch is not part of the evidence for the theory.

What I need to defend is the theory that I have developed. There is no onus on me to defend my reasons for developing it, or to defend the theory by appealing to the reasons that led me to develop it—such as an

aesthetic preference for unification, accompanied by hunches about which occurrences of names should not fall under the umbrella of such a unification.

15. Conclusion

Let me review what has been accomplished here in defense of Predicativism. First, explication of the theory revealed that it provides a uniform account of names: it assigns the same semantic type (that of a predicate) and applicability condition (the being-called condition) to names when they occur in predicate position as it does when they occur in argument position as bare unmodified singulars.

Second, I addressed an argument against Predicativism that continues to surface: the argument that it is a point against Predicativism that names do not have the same syntax as other count nouns. I countered with an obvious reply: there is more than one kind of count noun. This sort of argument counts no more against Predicativism than it does against *Massism*, the view that mass terms like 'cutlery' are common nouns even though they have a different syntax from other common nouns, like 'dog'.

Third, I presented Sloat's disjunctive generalization of the syntactic difference between names and common count nouns. I explained why Sloat posited that apparently bare unmodified singular names really complement a null definite article. I argued for two amendments to Sloat's disjunctive generalization and showed that with those amendments in place, we could give a streamlined, nondisjunctive generalization ("Where \emptyset_{the} ") of when the definite article would appear overtly as 'the' with a name and when it would be phonologically null. There were two important corollaries here: (A) neither Referentialism nor 'That'-Predicativism can accommodate the streamlined generalization, and (B) the fact that 'The'-Predicativism alone can explain the syntactic facts displayed in the Sloat chart means that it has explanatory power that its main rivals do not have.

Fourth, I demonstrated that names and incomplete definite descriptions are rigid in just the same sentential environments as each other, so the rigidity of names is not only compatible with the **Denuded Definite Description Thesis** but predicted by it.

The ultimate defense of 'The'-Predicativism would consist of more than what I have done here. It would require evaluations of relative simplicity with other theories of names. For example, I have not engaged in

any serious way with Leckie's Referentialism, which she calls a "polysemy" view of names. And there are rival views that I have not considered at all. In particular, I have not said anything about the view that names are variables, a view associated with Takashi Yagisawa (1984), Joshua Dever (1998), and Samuel Cumming (2008).

Gabriel Segal has suggested that various psychological data regarding linguistic deficits and development show that names and common nouns are distinguished in cognition. On the present theory, however, names are differentiated from common nouns in at least two relevant respects. First, they are of a different grammatical category: names differ syntactically from common nouns since they distribute differently with respect to the overt definite article. Furthermore, names have a distinctive condition of application, as reflected in the being-called condition. Whether or not a name applies to a thing depends on what names the thing has, which in turn depends on certain events having taken place: that the thing has been given a certain label, as it were, in an appropriate way (for example, by its parents, by itself, or by its owner), or that a certain label become regularly used to address or refer to it (for example, by scholars, scientists, or other relevant experts). For those reasons, there being cognitive or neurological differences between names and common nouns presents no special difficulty for 'The'-Predicativism, any more than do cognitive differences between predicates for biological kinds and those for artifact kinds or between predicates that are adjectives and ones that are nouns or between predicates for concrete objects and ones for abstract objects.

An evaluation of the relative simplicity of Referentialism and Predicativism would require a comparison of the complexity and number of different principles required in order for each one to be empirically adequate. If such principles are already needed to support theories of expressions other than names, then they do not increase the complexity of the theory. I have in mind here, for example, principles governing metonymy of various sorts—as when we can use the name 'Obama' as a predicate true of things wearing an Obama costume at a Halloween party just as we can use the common noun 'witch' as a predicate true of things wearing a witch costume at a Halloween party. Further if the theory itself has explanatory power in the sense that other phenomena are explained by it, then that roughly decreases the complexity of the theory. I have in mind here the distribution of names with the overt definite article.

I also have in mind the validity of certain entailment patterns holding between the occurrences of names as bare singulars and the

rest. As Jennifer Hornsby (1976, 229) pointed out, (110) entails (111).⁵¹

- (110) Alfred is sane.
- (111) Not all Alfreds are crazy.

These "Hornsby entailments" are an immediate consequence of predicativism.⁵² We might also note, that in the preceding sentence, the name 'Hornsby' occurs as an attributive noun, just as common count nouns can, as in 'automobile regulations', 'student concerns', and 'school closings'.

And 'The'-Predicativism in particular, as contrasted with 'That'-Predicativism, affords a streamlined syntactic generalization of the Sloat distribution patterns. Furthermore, the rigidity of bare singular names in argument position requires no special, ad hoc principles to support it. We might also add that various metonymic uses of names are explained by already posited principles of (for example) deferred interpretation—as in the costume examples.

Although uniformity is not virtuous per se, we do not yet have a theory of the semantics of names that is simpler or more explanatorily powerful than 'The'-Predicativism.

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- 51. The same point has been made, apparently independently, using different examples, by Elugardo (2002, 476), Kroll (n.d.), Leckie (2013), and Pietroski (2007, 353).
- 52. I should say, though, that some authors have argued, quite plausibly, that such entailments can already be explained as instances of a more general phenomenon of semantic shift (Leckie [2013], Rami [2014]).

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