Morphological case is one of the core categories in Western grammatical tradition, and has been from the beginning of that tradition in ancient Greek and Latin grammars. Yet the criteria for what forms should be included in case paradigms of languages are by no means clear. In this article I will scrutinize these criteria in the grammars of the Finnish and Hungarian languages. (I will keep to the traditional, surface-morphological concept of case and leave aside the more abstract definitions of case in, e.g. Case Grammar or Dependence Grammar.)

Finnish is traditionally thought to have a paradigm of 15 separate cases. The position of one of these cases is, however, a problematic one; and Finnish nominal stems can take endings that are not habitually included with the case forms, although the criteria are far from self-evident.

The position of the accusative in the case paradigm of Finnish has sometimes been called into question. Finnish nouns have no accusative forms of their own, different from all others: the object noun in Finnish stands always either in the genitive (alternatively seen, in a form identical to the genitive: *avasin ikkunan* ‘I opened the window’, -*n* being the genitive ending) or in the nominative (always in the plural: *avasin ikkunat* ‘I opened the windows’, and in several cases also in the singular, e.g. in the imperative mood: *avaa ikkuna* ‘open the window!’) In general, the object form with -*n*, identical to the genitive singular, is thought to have developed historically from the Proto-Finnic genuine accusative ending *-*m* — genuine in the sense that it was different from every other case ending. The object forms identical with the nominative singular and plural, on the other hand, are historical nominatives: the plural object is thought never to have stood in the *-*m*-form, and the alteration of forms with and without a case ending in singular objects is probably inherited from the very oldest reconstructable proto-language, Proto-Uralic, although the conditions of that alternation were different from modern Finnish.

In Finnish, the accusative has genuine endings only in personal pronouns (nom. *minä*, *sinä*, *hän*, *me*, *te*, *he*) and in the interrogative pronoun *kuka* ‘who’ (resp. acc. forms: *minut*, *sinut*, *hänet*, *meidät*, *teidät*, *heidät*; interr. pron. *kenet*; originally, the interrogative pronouns *kuka* and *ken*, both meaning ‘who’, were separate lexemes, but in modern Finnish, the nominative singular *ken* and all forms of *kuka* except the nominative singular are archaic or poetical). The ending -*t* in the accusative of
these pronouns is clearly derived analogically from the -t of the Finnish nominative plural. Historically, this accusative form is relatively young and has been taken into written Finnish from the eastern dialects — in the western dialects it was traditionally absent and, therefore, did not occur in the Old Written Finnish (16th to early 19th centuries), which was based mainly on these dialects.

In modern Standard Finnish there are, in any case, seven lexemes with an accusative form that differs from every other case form of these lexemes. For this reason, and also due to the syntactically central position of the object category, the accusative is, according to the dominant view, included in Finnish nominal paradigm.

On the other hand, in Estonian (closely related to Finnish), the total object (an object that does not stand in the partitive case — as objects often do in Finnish too) is, without exception, identical with the nominative or genitive. But in earlier times, it was a controversial question among Estonian grammarians whether there is an accusative case in Estonian. F.J. Wiedemann’s view from the early 19th century has become dominant: he argued that a form, in order to be included in the case paradigm of a language, has to have an ending of its own, different from any other endings, in at least some lexemes; otherwise one could postulate an endless number of cases for the different meanings of every ending.

In the case paradigm of Finnish, the crucial criteria have traditionally been a) whether a particular ending can attach productively, in principle, to any kind of nominal (nominals = nouns, adjectives, numerals, pronouns), and b) whether it can occur in an adjectival attribute of a noun. If neither is the case, then even a frequent form has not been included in the Finnish case paradigm.

The ending -sti is very frequent and can be attached to most adjectives and to simple numerals (helpsti ‘easily’, kätevästi ‘adroitly’, kabdesti ‘twice’, tubanestist ‘a thousand times’) and, in addition, to a couple of indefinite pronouns expressing number (moneststi, useaststi, both meaning ‘several times’) — but for semantic reasons, not e.g. *märästi, “wetly”, or *kaljusti, “baldly”, and for pragmatic reasons, not to compound numerals either — *viidestikymmenenestikaudestti ‘56 times’. With nouns, -sti occurs mostly in swear words (helvestisti ‘infernally much’ < helvetti ‘hell’), only in a few others (kiireeststi ‘hastily’, ihmeeststi ‘wonderfully’, leikststi ‘in [children’s] play’); of these, only kiireeststi belongs to normal, non-colloquial Standard Finnish style. Therefore, -sti is categorized as an adverbial derivative and not a case ending.

The ending -tse, expressing thoroughfare, has a name (prolative), but for both of the above-mentioned reasons it has, by tradition, not been accepted as a case ending: apart from word play, it can be attached to only a few words: maitstse ‘(go, transfer) by land’, meritstse ‘by sea’, veststse ‘by water’ and perhaps some others — but not *pelloitstse ‘across a field’, *järvitstse ‘over a lake’, and not in an adjectival attribute either: *lumisitsemaitstse ‘by snow-covered land’ — although these would make no
less sense semantically. To a small extent, it has become acceptable in a few more words indicating means of communication: *posttse* 'by post', *pubelimittse* 'by phone' and recently (by analogy) *faksittse* 'by fax' and *tekstitiettse* 'by SMS'. These extremely rare additions are, however, very far from actual productivity.

Sometimes one gets a question: “What is the name of the case form *-sin*?” But this form does not qualify as a case ending either: it can be attached only to a limited number of nouns, mostly to those expressing time: seasons and times of day (*kesäisin* ‘every summer’, *aamuisin* ‘every morning’), days of the week and some other days (*tiistaisin* ‘on Tuesdays’, *arkisin* ‘on weekdays’, *jouluisin* ‘every Christmas’); in other than temporal nouns it is rare (*jalkaisin* ‘by foot’, *väkisin* ‘by force’). It has obviously been formed after the model of the instructive case of words that end in *-nen* in the nominative (*nykyisin* ‘nowadays’, from nom. sg. *nykyinen* ‘present, current’); even those *-sin* endings that synchronically are attached directly to noun stems are historically forms of an adjective derived with the ending *-nen* (e.g. *kesäisin* probably is originally derived from the adjective *kesäinen* ‘occurring in, characteristic of the summer’, not from the root *kesä* ‘summer’).

The ending *-ttain / -ttäin* (alternation due to vowel harmony), expressing several kinds of amounts (*pareittain* ‘in couples’, *sadoittain* ‘by the hundred’, *päivittäin* ‘daily’; *puusktittain* ‘in blasts [of wind]; by fits and starts’; etc.), is, to some extent, even productive: although it can be used in only some kinds of words it can, in any case, be attached to many new word stems. Historically it is clear that this ending as well is an old instructive ending; it can be attached to many more (and more kinds of) words than *-sin* but it still has clear limitations on its use and does not occur in adjectival attributes (*rajuittain puuskittain* ‘in fierce blasts [of wind]’); therefore it too is excluded from Finnish case paradigm.

Some forms are historical case endings which, because of similar limitations, are not viewed as such in modern Finnish. In the words *ylös* ‘up(wards)’, *alas* ‘down(wards)’, *ulos* ‘out’, *kauas* ‘(to) far away’, *kunnes* ‘until’ etc., the ending *-s* is originally a case form called the lative which ceased to be productive long ago; it was historically significant in forming a part of several other local case endings still in use in Finnish. The ending *-nti*, expressing terminal point and accordingly named terminative, is known from some dialectal words and old folk poetry but in contemporary Finnish is used only in the expression *kaikki tyvymi* ‘every least bit, every single one’. In Estonian, by contrast, it is a fully productive case ending (*linnani* ‘up until the town’).

A rare case form attested in some dialects of Finnish is the exessive, *-nta / -ntä*; it has developed on the basis of the historical separative case *-ta / -tä* (which is also the origin of the contemporary Finnish partitive case, which has changed from its historical local meaning into a grammatical case) and has been used in roughly the same meaning: *luonta* ‘from the vicinity of’, *takanta* ‘from behind’. The form
is relatively young, which can be seen from the fact that it does not take part in Finnish consonantal gradation of stops (\textit{takanta}, never \textit{*taanta} – although \textit{taakse} ‘(to) behind’ where the gradation does take place). In contrast to the Estonian terminative, neither the exessive nor the above-mentioned prolative have become productive case endings in any Finnic language.

Little used or obsolete case forms are not limited to the Uralic languages. In Latin, serving for a long time as a model for grammars of other languages, there is, in a few words, a locative case ending -\textit{i} as a relict (\textit{domi} ‘at home’, \textit{vesperi} ‘in the evening’), not included among the proper cases; likewise in Swedish the dative ending, otherwise obsolete, remains in some archaic expressions: \textit{til fullo} ‘completely’. These are like the Finnish lative, which in Proto-Finnic actually was a productive case form; by contrast, the Finnish prolative, exessive and terminative cases have not faded away but, rather, are stillborn: they never became proper productive cases. In the grammars of most languages, marginal cases like this are usually left outside case paradigms.

The grammarians of another Uralic language, Hungarian, have traditionally taken a different line. If the number of Finnish cases is generally regarded to be 15, the only correct answer to the question “How many cases are there in Hungarian?” would be: “No one knows – not even the Hungarians themselves.”

The only thing that is certain is that Hungarian has more cases than Finnish: even by the strictest criteria, there are at least 16 cases with no morphological or semantic restrictions on their use. But the criteria for the definition of case forms in Hungarian are different from those in Finnish; this is due both to grammatical reasons and to the research tradition.

One of the criteria for classifying Finnish case forms, i.e. whether an ending can be attached to an adjectival attribute, has no validity in Hungarian: as attributes of nouns, the Hungarian adjectives take no endings. Whereas in Finnish the adjectival attributes agree in number and case with their main words (\textit{kauniissa talossa} ‘in a beautiful house’), in Hungarian, case endings are attached only to the head noun (\textit{szép házban} ‘idem’, not \textit{*széppen házban}). Adjectives take case endings in Hungarian only when their head noun is elliptically left out: \textit{Imre egy fehér házban lakik és én egy sárgában} ‘Imre lives in a white house and I in a yellow one’; \textit{fehér} ‘white’, \textit{sárga} ‘yellow’. The same is true of the numerals: \textit{Imre két városban lakott és én háromban} ‘Imre has lived in two towns and I in three’; \textit{két} ‘2’, \textit{három} ‘3’.

The difference in case criteria that has to do with respective grammatical traditions is that Hungarian grammarians have not followed as strict a line as their Finnish counterparts regarding how productive the usage of an ending has to be to qualify as a case form. In almost all Hungarian grammars the temporal ending -\textit{kor} (whose very name is ‘temporal’) is included in the case paradigm; the ending is used only in expressing a point of time: \textit{hatkor} ‘six o’clock’ (from \textit{hat} ‘6’),
húsvetkor ‘at Easter’, akkor ‘then’ (from az ‘that’). The multiplicative case has the endings -szor/-szer/-ször (due to vowel harmony) and is used only in numerals, expressing either the number of times (like the Finnish ending -sti in numerals) or, with ordinal numerals, the order of times (háromszor ‘three times’, harmadszor ‘for the third time’). The ending of essive-modal -ul/-ül is used almost exclusively in names of languages for knowledge of or meanings in a particular language: Beszélsz magyarul? ‘Do you speak Hungarian?’, Mi az finnül? ‘What is that in Finnish?’, otherwise it is only rarely used (yet példűl ‘for instance’). None of these endings would qualify as case forms in Finnish grammatical tradition, in spite of their considerable breadth and frequency of usage. Grammatically it is all but impossible to decide whether -kor should be regarded as a case form (as generally is done) or a derivational suffix; since kor exists in Hungarian also as an independent word, meaning ‘time’, it would even be plausible to see it as an uninflected noun in a compound; a parallel example is nap ‘day’ which often is uninflected in temporal compounds: tegnap ‘yesterday’ (both as a noun and as an adverb of time); vasárnap, both ‘Sunday’ and ‘on Sunday’.

But there are also endings that can be attached only in very few stems and yet, according to most (but not all) grammars, are included in the case paradigm. Precisely because of this there is not the slightest irony in saying that not even Hungarians themselves know how many cases there are in their language. Among these marginal forms are -lag/-leg (valószínűleg ‘probably’; almost the only word with that ending which does not sound archaic in the modern language); another temporal form -nja/-nte (nyáronta ‘every summer’, telente ‘every winter’; this is used with few other words, is always archaic and can always be replaced with another, synonymous ending) and instrumental-comitative -stul/-stül (ruhástul ‘with clothes on’, ferjestül ‘with her husband’; this ending can likewise always be replaced with other endings and is practically obsolete in colloquial usage). By contrast, even the Finnish prolative -tse, despite the limitations of its usage, can be attached to more lexemes than some of the above Hungarian forms.

There is considerable variation among grammatical treatises of Hungarian about which of these marginal forms are included in the case paradigm. According to the grammarians following the strictest criteria, only 17 or 18 forms are accepted as cases; most commonly, the grammatical treatises include 23–25 of them; the greatest number I have met is found in Professor István Nyirkos’s primer of Hungarian for Finnish speakers, Nykyunkarin oppikirja (1972) which counts 28 different cases in Hungarian.

On the other hand, some scholars of the Hungarian language do not accept as cases those forms that cannot be attached to nouns, and they therefore exclude both the multiplicative (see above), used in numerals only, and the modal-essive -n (not to be confused with the above essive-modal) which forms adverbials from
adjective stems (fiatalan ‘when young’). In most grammars they are, however, included in the paradigm.

If case forms were defined for Finnish by the same criteria as for Hungarian, the adverbial ending -sti would certainly qualify, the distributive -ttain/-ttäin without difficulties, the temporal -sin and the prolative -tse fairly easily — some grammars would probably include even the historical lative -s and locative -na/-nä (kotona ‘at home’, kaukana ‘far, in a faraway place’ — the ending is also productive also as the contemporary essive case but has taken the meaning ‘as’; the locative usage, although original, remains today only in a few word forms).

By contrast, the above-mentioned Finnish exessive would probably not be included in the Finnish case paradigm even according to the Hungarian criteria, because it has hardly ever been in use in written Finnish but almost exclusively in dialects — and infrequently even there. In Hungarian dialects, too, there have been case forms that only exceptionally have been used in written Hungarian and, therefore, have not been included in Hungarian grammars. I am referring to the three so-called “family cases” in the eastern and northern dialects of Hungarian, which express ‘going to’, ‘being with’ and ‘going from’ the family or other group of the referent: Jánosni ‘(going) to János’s family’; Jánosnott ‘(being or living) among János’s family’; Jánosnől ‘leaving János’s family’. These forms follow the scheme of the nine (3 × 3) extant local cases of Hungarian, but today the “family cases” probably are obsolete even in dialects.

The main differences between the criteria for case forms in Finnish and Hungarian grammars are: a) one of the two main criteria for Finnish cases, i.e. whether a form can be attached to an adjectival attribute, cannot be applied in Hungarian because of the lack of concord of adjectives with their head nouns, and b) in Hungarian, the gap between productive and unproductive cases is not as wide as in Finnish because in Hungarian there are more such endings which have limitations in their usage but still can be attached to a fairly large number of stems; in Finnish, such endings include only the adverbial -sti and, to a lesser extent, the distributive -ttain/-ttäin. Therefore, the line between clearly productive and clearly marginal case forms is less clear in Hungarian than in Finnish.