

WHY GETTIER CASES ARE STILL MISLEADING: A REPLY TO ATKINS

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ABSTRACT: In this paper, I respond to Philip Atkins' reply to my attempt to explain why Gettier cases (and Gettier-style cases) are misleading. I have argued that Gettier cases (and Gettier-style cases) are misleading because the candidates for knowledge in such cases contain ambiguous designators. Atkins denies that Gettier's original cases contain ambiguous designators and offers his intuition that the subjects in Gettier's original cases do not know. I argue that his reply amounts to mere intuition mongering and I explain why Gettier cases, even Atkins' revised version of Gettier's Case I, still contain ambiguous designators.

KEYWORDS: ambiguous designator, analysis of knowledge, Gettier cases, justified true belief, semantic reference, speaker's reference

1. Introduction

In a reply to my "Why Gettier Cases Are Misleading,"¹ Philip Atkins sets out to defend the "orthodox view in contemporary epistemology," according to which "Edmund Gettier *refuted* the JTB [Justified True Belief] analysis of knowledge" (emphasis added).² Before I address Atkins' objections against the argument I put forth in "Why Gettier Cases Are Misleading," I would like to point out a few things that I find rather peculiar about his reply. First, Atkins contends that "Gettier's two cases [...] are genuine counterexamples to the JTB analysis."³ But then he proceeds to "*revise* Gettier's first case so that there is no such semantic failure [i.e., failure to refer to the semantic referent of 'coins']" (emphasis added). If Atkins needs to *revise* Gettier's Case I in response to my criticism against it, then that means that Gettier's original case is *not* a genuine counterexample to the JTB analysis. After all, if it were a genuine counterexample, then there would be no need to revise it; it would work against the JTB analysis just as it is. Of course, epistemologists have long recognized that Gettier's original cases are problematic. One problem with Gettier's original cases, which I discuss in the paper to which Atkins responds, is the problem of false lemmas. Many epistemologists have found

¹ Moti Mizrahi, "Why Gettier Cases Are Misleading," *Logos & Episteme* 7 (2016): 31-44.

² Philip Atkins, "Are Gettier Cases Misleading?" *Logos & Episteme* 7 (2016): 379-384.

³ Atkins, "Are Gettier Cases," 379.

it problematic that the subjects in Gettier's original cases infer their candidates for knowledge from falsehoods, and so have constructed Gettier-style cases with "no false lemmas."⁴ Curiously, Atkins does not mention any of this and proceeds to defend Gettier's original cases as if they are entirely unproblematic, even though he is aware of the fact that I discuss "several 'Gettier cases' besides the two that Gettier originated."⁵ As a result, Atkins' paper presents a somewhat inaccurate picture of the state of the debate over the status of Gettier cases as a "refutation" of the JTB analysis of knowledge.

Speaking of "refutations," another thing I find rather peculiar about Atkins' reply to my "Why Gettier Cases Are Misleading" is his use of the term 'refutation' in conjunction with his hedging and *seeming* talk. On the one hand, Atkins claims that Gettier's original "cases *refute* the JTB analysis of knowledge" (emphasis added).⁶ If such cases do indeed amount to a *refutation* of the JTB analysis of knowledge, however, it is difficult to see why Atkins needs to *hedge* his claims and engage in *seeming* talk. Here are a couple of examples from his paper:

Many have the *strong intuition* that Smith fails to know (I). [(I) The man who will get the job has ten coins in his pocket.] Since Smith is justified in believing (I), we *seem* to have a counterexample to the JTB analysis (emphasis added).⁷

I cannot speak for everyone, but *I* have the *strong intuition* that Smith fails to know (I*). Since Smith is justified in believing (I*), we *seem* to have a counterexample to the JTB analysis (emphasis added).⁸

Of course, Atkins is not doing something new here. Arguments from Gettier cases against JTB are nothing more than appeals to intuition. If these arguments are to count as *refutations* of the JTB analysis of knowledge, i.e., conclusive proofs that

⁴ For the "no false lemmas" response to Gettier cases, see David M. Armstrong, *Belief, Truth, and Knowledge* (New York: Cambridge University Press, 1973), 152 and Michael Clark, "Knowledge and Grounds: A Comment on Mr. Gettier's paper," *Analysis* 24 (1963): 46-48. See also Robert K. Shope, *The Analysis of Knowing: A Decade of Research* (Princeton, NJ: Princeton University Press, 1983), 24 and the Appendix in John L. Pollock, *Contemporary Theories of Knowledge* (Totowa: Rowman and Littlefield, 1986). Cf. Michael Levin, "Gettier Cases Without False Lemmas," *Erkenntnis* 64 (2006): 381-392. An early so-called Gettier-style case without false lemmas can be found in Gilbert Harman, *Thought* (Princeton: Princeton University Press Harman, 1973), 75. Cf. William G. Lycan, "On the Gettier Problem Problem," in *Epistemology Futures*, ed. S. Hetherington (New York: Oxford University Press, 2006), 148-168. Lycan defends JTB with the addition of the "no false lemmas" condition.

⁵ Atkins, "Are Gettier Cases," 379.

⁶ Atkins, "Are Gettier Cases," 382.

⁷ Atkins, "Are Gettier Cases," 380.

⁸ Atkins, "Are Gettier Cases," 381.

JTB is false, it must be the case that our intuitions about hypothetical cases, such as Gettier cases, perfectly track the epistemic facts about such cases. This assumption, however, is rather controversial,⁹ especially in light of the empirical evidence from experimental philosophy and cognitive science.¹⁰ So, again, by proceeding as if Gettier's original cases are entirely unproblematic, Atkins' paper presents a somewhat inaccurate picture of the state of the debate over the status of Gettier cases as a "refutation" of the JTB analysis of knowledge. Gettier's original cases are problematic in at least two respects. First, they involve inferences from falsehoods. Second, the arguments made on the basis of Gettier cases are appeals to intuition, which are themselves a rather controversial sort of arguments in philosophy.¹¹

Finally, as the quotes above illustrate, Atkins insists that his intuition is that subjects in Gettier cases do not know that *p*. Clearly, since I have argued that Gettier cases are misleading, which means that we should not assign much, if any, evidential weight to the so-called "Gettier intuition," i.e., the intuition that *S* doesn't know that *p* in a Gettier case, I do not find Atkins' insistence that he shares the "Gettier intuition" to be compelling evidence against my argument to the effect that Gettier cases are misleading.

With these preliminary remarks in hand, I will now address Atkins' objections and his attempt to defend the claim that Gettier's original cases "are genuine counterexamples to the JTB analysis."¹²

2. Atkins' Defense of Gettier's Case I

Atkins aims to defend Gettier's Case I by modifying it such that it does not involve any ambiguous designators. In my "Why Gettier Cases Are Misleading," I argue that 'coins' in

(I) The man who will get the job has ten coins in his pocket¹³

is an ambiguous designator. Atkins offers a revised case in which there are no ambiguous designators, or so he claims.

⁹ See Moti Mizrahi, "Don't Believe the Hype: Why Should Philosophical Theories Yield to Intuitions?" *Teorema: International Journal of Philosophy* 34 (2015): 141-158.

¹⁰ See Moti Mizrahi, "Three Arguments Against the Expertise Defense," *Metaphilosophy* 46 (2015): 52-64.

¹¹ See Moti Mizrahi, "Does the Method of Cases Rest on a Mistake?" *Review of Philosophy and Psychology* 5 (2014): 183-197.

¹² Atkins, "Are Gettier Cases," 379.

¹³ Edmund L. Gettier, "Is Justified True Belief Knowledge?" *Analysis* 23 (1963): 121-123.

Suppose that Smith has strong evidence for believing that Jones is the man who will get the job and that Jones is handsome. We can suppose that Smith is justified in believing that Jones is handsome based on seeing Jones in person. Smith makes a rudimentary logical inference and says the following:

(I*) The man who will get the job is handsome.

It turns out that (I*) is true, but not for the reasons that Smith thinks. For it turns out that Smith is the man who will get the job and that, unbeknownst to Smith, he is also handsome. I cannot speak for everyone, but I have the strong intuition that Smith fails to know (I*). Since Smith is justified in believing (I*), we seem to have a counterexample to the JTB analysis.¹⁴

At first, Atkins simply asserts that, as far as he can tell, “there is no semantic failure when Smith uses the predicate ‘is handsome’.”¹⁵ But then he acknowledges that there is an ambiguous designator in this case after all. The ambiguous designator is ‘the man’. As Atkins himself writes, “The speaker’s referent [of ‘the man’] is Jones, whereas the semantic referent [of ‘the man’] is Smith himself.”¹⁶

Because of this, presumably, Atkins revises Gettier’s Case I for the second time, this time to remove the ambiguous designator ‘the man’.

Suppose again that Smith has strong evidence for believing that Jones is the man who will get the job and that Jones is handsome. Smith performs an existential generalization and says the following:

(I**) There is someone who is both getting a job and handsome.

It turns out that (I**) is true, but not for the reasons that Smith thinks. For it turns out that (I**) is made true by Smith himself. Even though Smith is justified in believing (I**), and even though (I**) is true, I have the strong intuition that Smith fails to know (I**).¹⁷

At this point, however, it looks like Atkins is simply engaging in intuition mongering.¹⁸ He claims to have a “strong intuition that Smith fails to know (I**),”¹⁹ but offers no reasons whatsoever to think that Smith indeed does not know that (I**) is the case. Perhaps Atkins has “the strong intuition that Smith fails to know (I**)”²⁰ because he has been taught that that’s the “right” response to Gettier cases.

¹⁴ Atkins, “Are Gettier Cases,” 380-381.

¹⁵ Atkins, “Are Gettier Cases,” 381.

¹⁶ Atkins, “Are Gettier Cases,” 382.

¹⁷ Atkins, “Are Gettier Cases,” 382.

¹⁸ See Moti Mizrahi, “Intuition Mongering,” *The Reasoner* 6 (2012): 169-170 and Moti Mizrahi, “More Intuition Mongering,” *The Reasoner* 7 (2013): 5-6.

¹⁹ Atkins, “Are Gettier Cases,” 382.

²⁰ Atkins, “Are Gettier Cases,” 382.

Or perhaps Atkins has “the strong intuition that Smith fails to know (I**)”²¹ because Smith infers (I**) from ‘Jones is the man who will get the job and Jones is handsome,’ which is false by stipulation. If so, then we run into the “no false lemmas” (or inference from falsehoods) problem again, which Atkins completely ignores in his reply to my “Why Gettier Cases Are Misleading,” as I have mentioned above.

More importantly, and again, as Atkins himself acknowledges, his second rendition of Gettier’s Case I still involves an ambiguous designator. For, as Atkins himself writes, “there is some sense in which Smith has Jones in mind when inferring (I**).”²² So, as Atkins himself admits, his second rendition of Gettier’s Case I is a case of reference failure after all. Atkins dismisses this referential ambiguity by simply asserting without argument that “this point *seems* irrelevant” (emphasis added).²³ It might *seem* irrelevant to Atkins, and Atkins offers no reasons to think that it is irrelevant, but it *isn’t* irrelevant. In fact, it is an objection I address in the paper to which Atkins is replying. As I argue in “Why Gettier Cases Are Misleading,” if the candidates for knowledge in Gettier cases contain ambiguous designators, then that means that the relevant beliefs are ambiguous between two interpretations: “an ‘objective’ interpretation in terms of the conditions that make the belief true (i.e., in terms of semantic reference or what a speaker’s words mean) and a ‘subjective’ interpretation in terms of what *S* means (i.e., in terms of speaker’s reference or what a speaker means in uttering certain words).”²⁴ In Atkins’ second rendition of Gettier’s Case I, then, the belief that there is someone who is both getting a job and handsome is ambiguous between these two interpretations:

Objective interpretation (semantic reference): the semantic referent of ‘someone’ in <there is someone who is both getting the job and handsome> is the actual person that makes <there is someone who is both getting the job and handsome> true; otherwise, <there is someone who is both getting the job and handsome> would not be true.

Subjective interpretation (speaker’s reference): the speaker’s referent of ‘someone’ in <there is someone who is both getting the job and handsome> is what Smith has in mind when he believes that there someone who is both getting the job and handsome, which is Jones, not Smith himself, who is actually the person that makes <there is someone who is both getting the job and handsome> true.

²¹ Atkins, “Are Gettier Cases,” 382.

²² Atkins, “Are Gettier Cases,” 383.

²³ Atkins, “Are Gettier Cases,” 383.

²⁴ Mizrahi, “Why Gettier Cases,” 43.

Interpreted “objectively,” or in terms of what the words mean, <there is someone who is both getting the job and handsome> is not what Smith actually believes, since Smith uses ‘there is someone who’ to talk about what his evidence leads him to believe, which is “that Jones is the man who will get the job and that Jones is handsome,”²⁵ not that Smith is the man who will get the job and that Smith is handsome. Interpreted “subjectively,” or in terms of what Smith means by uttering these words, <there is someone who is both getting the job and handsome> is strictly false, since Smith uses ‘there is someone who’ to talk about something that does not in fact fulfill the conditions for being the semantic referent of ‘someone’ in this case.

In other words, Smith’s belief that there is someone who is both getting a job and handsome is ambiguous between two interpretations:

1. *Semantic reference*: There is someone (= Smith) who is both getting the job and is handsome.
2. *Speaker’s reference*: There is someone (= Jones) who is both getting the job and is handsome.

By stipulation, (2) is false, since it turns out that Smith gets the job. On (2), then, Smith simply has a false belief. On the other hand, (1) is not actually what Smith believes in this case, since Smith wishes to talk about Jones, which is what Smith’s evidence is about. To put it crudely, on (1), what goes on in Smith’s head does not match the facts of the case. Given this ambiguity, then, Atkins’ second rendition of Gettier’s Case I, like Gettier cases in general, is misleading.

3. Atkins’ Defense of Gettier’s Case II

Atkins’ attempt to defend Gettier’s Case II looks like another instance of intuition mongering. Atkins simply recounts Gettier’s Case II, without revisions, and asserts that

Many have the *strong intuition* that Smith fails to know (h). [(h) Either Jones owns a Ford or Brown is in Barcelona.] Since Smith is justified in believing (h), we *seem* to have a counterexample to the JTB analysis (emphasis added).²⁶

Atkins’ “strong intuition” notwithstanding, there is an ambiguous designator in Gettier’s Case II, as I point out in “Why Gettier Cases Are Misleading.” As Atkins himself writes, Smith’s evidence for (h) is that “Jones has at all times in the past owned a car, and always a Ford, and that Jones has just offered

²⁵ Atkins, “Are Gettier Cases,” 382.

²⁶ Atkins, “Are Gettier Cases,” 383.

Smith a ride while driving a Ford.”²⁷ As in Gettier’s Case I, then, there is a mismatch between what goes on in Smith’s head and the facts about the case. Another way to see this, in addition to the way I have described above, is the following. In Atkins’ second rendition of Gettier’s Case I, Smith reasons as follows:

a. Jones will get the job.

Therefore,

b. There is someone who will get the job.

c. Jones is handsome.

Therefore,

d. There is someone who is handsome.

Therefore,

e. There is someone who will get the job *and* there is someone who is handsome.

As we can see, Smith’s evidence supports (e), not the belief that the one who will get the job and the one who is handsome are *one and the same person*. To see why, note that the move from (a) to (b) and the move from (c) to (d) are instances of existential generalization. If Smith were to reason backwards, however, from (e) by existential instantiation, Smith could just as easily end up with the false belief that Jones will get the job instead of the true belief that Smith will get the job; hence the ambiguity in terms of the referent of ‘someone’; in Smith’s mind that someone is not Smith himself, but rather Jones, since that is what Smith’s evidence, i.e., (a) and (c), is about.

From a logical point of view, this counts as an instance of equivocation. According to Quine,

[t]he fallacy of equivocation arises [...] when the interpretation of an ambiguous expression is influenced in varying ways by immediate contexts [...], so that the expression undergoes changes of meaning within the limits of the argument.²⁸

In Atkins’ revised version of Gettier’s Case I, Smith reasons from evidence about one thing (namely, Jones) to a conclusion that is made true by something else (namely, Smith). This switch in reference “within the limits of the argument” makes this case appear like a genuine counterexample to JTB, even though it is not.

Similarly, in Gettier’s Case II, Smith reasons as follows:

²⁷ Gettier, “Is Justified,” 122.

²⁸ W. V. Quine, *Methods of Logic*, 4th Ed (Cambridge: Harvard University Press, 1982), 56.

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- i. "Jones has *at all times in the past within Smith's memory* owned a car" (emphasis added).²⁹
- ii. "Jones has *at all times in the past within Smith's memory* owned a Ford" (emphasis added).³⁰
- iii. "Jones has *just* offered Smith a ride while driving a Ford" (emphasis added).³¹

Therefore,

- iv. Jones owns a Ford.

Therefore,

- v. Either Jones owns a Ford or Brown is in Barcelona.

Contrary to what Atkins suggests, Smith cannot simply make "a rudimentary logical inference"³² from (i)-(iii) to (v), since (v) does not follow from (i)-(iii). Rather, (i)-(iii) are evidence for (iv), and then Smith infers (v) from (iv) by "a rudimentary logical inference,"³³ namely, addition.

As stipulated, however, "Jones does *not* own a Ford, but is *at present* driving a rented car" (emphasis added).³⁴ Note the use of temporal terms, such as 'at all times in the past', 'just', and 'at present', which is crucial here. For Smith wishes to talk about the person who "has *at all times in the past within Smith's memory* owned a Ford" (emphasis added).³⁵ It just so happens that this person does not own a Ford *at present*. Of course, this sort of thing happens all the time; something could be true about a person at one point in time and then stop being true at a later point in time. The proposition 'George W. Bush is the President of the United States' was true from 2001 until 2009, but it was not true before 2001 and it is not true *at present*. The proposition 'Barack Obama is the President of the United States' is true now, but it will no longer be true after January 20, 2017. Suppose, then, that on January 21, 2017, an eight-year-old reasons as follows:

Barack Obama has at all times in the past within my memory been the US President.

Therefore,

²⁹ Gettier, "Is Justified," 122.

³⁰ Gettier, "Is Justified," 122.

³¹ Gettier, "Is Justified," 122.

³² Atkins, "Are Gettier Cases," 383.

³³ Atkins, "Are Gettier Cases," 383.

³⁴ Gettier, "Is Justified," 123.

³⁵ Gettier, "Is Justified," 122.

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Barack Obama is the US President *at present* (where the present time is January 21, 2017).

The eight-year-old's belief that Barack Obama is the US President at present will be false on January 21, 2017. The problem is that 'Barack Obama' is referentially ambiguous in this context. The reference of 'Barack Obama' in 'Barack Obama has *at all times in the past within my memory* been the US President' was fixed at some particular time in the past, since this piece of evidence comes from memory, whereas 'Barack Obama' in 'Barack Obama is the US President *at present*' is supposed to pick out the *present* US President.

Similarly, Smith infers (iv) from evidence that is time-indexed to a particular time in the *past*, since Smith wishes to talk about the person who "has *at all times in the past within Smith's memory* owned a Ford" (emphasis added),³⁶ but that no longer pertains to the *present* time, since Jones "is *at present* driving a rented car" (emphasis added).³⁷ Accordingly, there is "an unsignaled shift in meaning"³⁸ in Smith's reasoning from "In the *past*, (i), (ii), and (iii) were the case" to "At *present*, (iv) is the case." For this reason, there is an ambiguity in Gettier's Case II. Unlike Gettier's Case I (and Atkins' revised versions of the case), however, the ambiguity is not in terms of the referent of 'someone' (i.e., Smith or Jones), but rather in terms of the time to which the relevant propositions are indexed (i.e., past or present).

Accordingly, Smith's evidence, i.e., (i)-(iii), supports the belief that Jones owns a Ford at t_1 (in the past), not the belief that Jones owns a Ford at t_2 (at the present time). To see why, note that, the move from (iv) to (v) is an instance of disjunction introduction. If Smith were to reason backwards, however, from (v) by elimination, Smith could just as easily end up with the false belief that Jones owns a Ford at t_2 (at the present time) instead of the true belief that Jones owns a Ford at t_1 (in the past);³⁹ hence the ambiguity in terms of the time to which the relevant belief is indexed; in Smith's mind his belief is indexed to a time in the past, not the present, since that is what Smith's evidence, namely, (i)-(iii), is about.

As with Gettier's Case I, from the point of view of argumentation theory, this counts as an instance of the fallacy of equivocation. According to Johnson and

³⁶ Gettier, "Is Justified," 122.

³⁷ Gettier, "Is Justified," 123.

³⁸ Ralph H. Johnson and J. Anthony Blair, *Logical Self-Defense* (New York: International Debate Education Association, 2006), 154.

³⁹ Assuming that Jones used to own a Ford at one point in the past. If Jones has never owned a Ford, even in the past, then Smith's evidence would be misleading, and (iv) would again be false.

Blair, “equivocation occurs when the same word or phrase undergoes an un signaled shift in meaning during one piece of discourse or argument.”⁴⁰ In Gettier’s Case II, the reference of ‘Jones’ in (i)-(iii) was fixed at some particular time in the *past*, since (i)-(iii) are based on what Smith *remembers* about Jones, whereas ‘Jones’ in (iv) is supposed to pick out the *present* Ford owner. This switch in reference “during one piece of discourse or argument” makes Gettier’s Case II appear like a genuine counterexample to JTB, even though it is not.

4. Conclusion

In conclusion, other than engage in intuition mongering, Atkins does not really provide reasons to think that Gettier cases are not misleading. As I have argued in “Why Gettier Cases Are Misleading” and above, Gettier’s original cases are misleading because the candidates for knowledge in these cases contain ambiguous designators. In other words, in Gettier’s original cases, there is a mismatch between what the subjects wish to talk about (i.e., speaker’s reference) and what makes the relevant propositions true (i.e., semantic reference). In Atkins’ revised version of Gettier’s Case I, the ambiguous designator is ‘someone’. When Smith believes that there is someone who is both getting the job and is handsome, Smith has Jones in mind, for Smith’s evidence is about Jones, not about Smith himself. Indeed, Atkins himself admits that “there is some sense in which Smith has Jones in mind when inferring (I**).”⁴¹ In Gettier’s Case II, the ambiguity is in terms of the time to which the relevant beliefs are indexed. When Smith believes that either Jones own a Ford or Brown is in Barcelona, Smith has *past* Jones in mind, for Smith’s evidence is about *past* Jones, not about *present* Jones. So, again, there is a sense in which Smith has past Jones in mind when inferring (v) from (iv) by addition. For some reason that he does not specify, however, Atkins deems these ambiguities “irrelevant.”⁴²

If this is correct, then it is still the case that Gettier cases are misleading because the candidates for knowledge in such cases contain ambiguous designators, which means that the relevant beliefs in such cases lend themselves to two interpretations: “an ‘objective’ interpretation in terms of the conditions that make the belief true (i.e., in terms of semantic reference or what a speaker’s words mean) and a ‘subjective’ interpretation in terms of what *S* means (i.e., in terms of speaker’s reference or what a speaker means in uttering certain words).”⁴³ Because

⁴⁰ Johnson and Blair, *Logical Self-Defense*, 154.

⁴¹ Atkins, “Are Gettier Cases,” 383.

⁴² Atkins, “Are Gettier Cases,” 383.

⁴³ Mizrahi, “Why Gettier Cases,” 43.

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of this ambiguity, we should not assign much, if any, evidential weight to the so-called “Gettier intuition,” i.e., the intuition that S doesn’t know that p in a Gettier case.