ARE GETTIER CASES MISLEADING?

Philip ATKINS

ABSTRACT: The orthodox view in contemporary epistemology is that Edmund Gettier refuted the JTB analysis of knowledge, according to which knowledge is justified true belief. In a recent paper Moti Mizrahi questions the orthodox view. According to Mizrahi, the cases that Gettier advanced against the JTB analysis are misleading. In this paper I defend the orthodox view.

KEYWORDS: analysis of knowledge, Gettier cases, semantic reference, speaker's reference

The orthodox view in contemporary epistemology is that Edmund Gettier refuted the JTB analysis of knowledge, according to which knowledge is justified true belief.[1] In a recent paper Moti Mizrahi questions the orthodox view.[2] According to Mizrahi, the cases that Gettier advanced against the JTB analysis are misleading. For, according to Mizrahi, they are cases of semantic failure (i.e., failure to refer to something) rather than epistemic failure (i.e., failure to know something). In this paper I defend the orthodox view.

I should mention that Mizrahi discusses several 'Gettier cases' besides the two that Gettier originated. Mizrahi discusses Roderick Chisholm's sheep case, Alvin Goldman's fake barn case, and Bertrand Russell's stopped clock case.[3] It is Mizrahi's opinion that all these cases are misleading. I disagree across the board, but for the sake of brevity I focus exclusively on Gettier's two cases. These are genuine counterexamples to the JTB analysis, or so I contend.

In Gettier's first case, Smith comes to have strong evidence for believing that Jones is the man who will get the job and that Jones has ten coins in his pocket. Smith makes a rudimentary logical inference and says the following:

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

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

[2] Moti Mizrahi, "Why Gettier Cases Are Misleading" *Logos & Episteme. An International Journal of Epistemology* VII, 1 (2016): 31-44.

[3] Roderick Chisholm, *Theory of Knowledge* (Englewood Cliffs, NJ: Prentice Hall, 1966); Alvin Goldman, "Discrimination and Perceptual Knowledge," *The Journal of Philosophy* 73 (1976): 771-791; Bertrand Russell, *Human Knowledge: Its Scope and Limits* (London: George Allen & Unwin, 1948).

It turns out that (I) is true, but not for the reasons that Smith thinks. For it turns out that Smith himself is the man who will get the job and that, unbeknownst to Smith, he also has ten coins in his pocket. Many 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.

But this case is misleading, according to Mizrahi, because Smith wishes to refer to the coins in Jones's pocket. Mizrahi invokes Saul Kripke's famous distinction between semantic reference and speaker's reference.[4] Roughly, the semantic referent of an expression is the thing designated by the expression according to the conventions of the language. The speaker's referent of an expression is the thing to which the speaker wishes to refer. Mizrahi argues that Gettier's first case is one where the semantic referent of 'coins' differs from the speaker's referent of 'coins.' The semantic referent is the set of coins in Smith's pocket, whereas the speaker's referent is the set of coins in Jones's pocket.[5] Since Smith fails to refer to the semantic referent of 'coins,' Gettier's first case is an instance of reference failure. This makes the case misleading, according to Mizrahi, since "we may be confusing the fact that Smith fails to refer to what actually fulfills the conditions for being the semantic referent of 'coins,' which is a semantic fact about the case, with an epistemic fact, namely that Smith doesn't know that (I) is the case."[6] Mizrahi concludes that our intuition about Gettier's first case should not be assigned much evidential weight.

Central to Mizrahi's argument is the possibility that we are confusing a certain kind of semantic failure with a certain kind of epistemic failure. This is supposed to explain our intuition about Gettier's first case. But if this is the correct explanation of our intuition, then the intuition should be absent when there is no such semantic failure. Unfortunately for Mizrahi, it is easy to revise Gettier's first case so that there is no such semantic failure. 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.

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[4] Saul Kripke, "Speaker's Reference and Semantic Reference," *Midwest Studies in Philosophy* 2 (1977): 255-276.

[5] Actually, it is far from clear that the semantic referent of 'coins' should be identified the specific set of coins in Smith's pocket, but this is Mizrahi's assertion, which I am willing to accept for present purposes.

[6] Mizrahi, "Why Gettier Cases," 35.

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.

As far as I can tell, there is no semantic failure when Smith uses the predicate 'is handsome.' Of course, theorists have various different opinions regarding the semantics of predicates. But, according to standard accounts, the semantic referent of a monadic predicate is a certain property, set, or function. To simplify matters, let us assume that the semantic referent of 'is handsome' is the property *handsomeness*. There is no special reason to insist that Smith, when using this predicate, fails to designate this property. He is using the predicate in the same way that he typically uses the predicate, after all. Mizrahi might argue that Smith is referring to *Jones's handsomeness*, rather than the general property *handsomeness*, and therefore there is semantic failure. But this argument would have very little plausibility. There are no independent grounds for making this argument, except that Smith intends to apply the predicate 'is handsome' to Jones. From this fact alone we should not conclude that there is semantic failure, unless we are prepared to conclude that many (most?) ordinary uses of the predicate are instances of semantic failure. When I say 'The president of the United States is handsome,' I intend to apply the predicate to Barack Obama. When I say 'Ryan Gosling is handsome,' I intend to apply the predicate to Ryan Gosling. When I say 'That guy is handsome,' I intend to apply the predicate to that guy. Even though I have specific men in mind when I use the predicate, it would be inappropriate to insist that I have failed to designate the semantic referent of the predicate.

In order for my case to parallel Gettier's original case, I have stipulated that Smith does not know that the predicate 'is handsome' applies to himself.[7] This might strike some readers as artificial, but it is not unrealistic to suppose that Smith is humble and therefore unaware of his own attractiveness. Of course, we can set up the case using different predicates. It seems to me that any monadic predicate would suffice, so long as Smith is justified in believing that the predicate applies to Jones, and Smith is unaware that the predicate also applies to himself. For example, we can set up the case using the predicate 'is wealthy.' For we can suppose that Smith is justified in believing that Jones is wealthy, but that Smith is

[7] Personally, I do not believe that this stipulation is necessary to refute the JTB analysis. Even if the case is set up so that Smith knows that he is handsome, I have the intuition that Smith does not know (I*). Similarly, even if Gettier's original case is set up so that Smith knows that he has ten coins in his pocket, I have the intuition that Smith does not know (I).

unaware that he himself is wealthy (unbeknownst to Smith, he has recently inherited a fortune from a deceased relative). We can set up the case using the predicate 'is Canadian.' For we can suppose that Smith is justified in believing that Jones is Canadian, but that Smith is unaware that he himself is Canadian (Smith is suffering from selective amnesia). None of these cases are plausible examples of semantic failure. All of these cases refute the JTB analysis of knowledge.

But perhaps I am being too quick. Even though there is no semantic failure when Smith uses the relevant predicate, it is somewhat plausible that there is semantic failure when Smith uses the definite description 'the man who will get the job.' The speaker's referent is Jones, whereas the semantic referent is Smith himself. This is not the kind of semantic failure emphasized by Mizrahi, but others have argued that it undermines Gettier's first case.[8] Does the possibility of this kind of semantic failure show that our intuition about Gettier's first case should not be assigned much evidential weight? I think not. If this kind of semantic failure is the correct explanation of our intuition, then the intuition should be absent when there is no such semantic failure. But again it is easy to revise Gettier's first case so that there is no such semantic failure. 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**). This intuition cannot be explained by the kind of semantic failure discussed above, since no such semantic failure is present. We are dealing here with an existential generalization. There is no definite description whose semantic referent is Smith and whose speaker's referent is Jones. There is no definite description whatsoever.

[8] Adrian Heathcote, "Truthmaking and the Gettier Problem," in *Aspects of Knowing: Epistemological Essays*, ed. Stephen Hetherington (Amsterdam: Elsevier, 2006), 151-168. Also relevant is Christoph Schmidt-Petri, "Is Gettier's First Example Flawed?" in *Knowledge and Belief*, ed. W. Löffler and P. Weingartner (ALWS, 2003), 317-319. Note that Schmidt-Petri relies on Keith Donnellan's distinction between the *referential* use of a description and the *attributive* use of a description, rather than Kripke's more general distinction between speaker's reference and semantic reference. See Keith Donnellan "Reference and Definite Descriptions," *The Philosophical Review* (1966): 281-304.

Of course, there is some sense in which Smith has Jones in mind when inferring (I**), but this point seems irrelevant. The fact of the matter is that (I**) is an existential generalization, whose content does not include Jones (or anyone else). There is nothing to prevent Smith from believing (I**). Since this belief is justified and true, the relevant question is whether this belief counts as knowledge. Unless we insist that Smith does indeed know (I**), we must conclude with Gettier that the JTB analysis is false.[9]

I turn finally to Gettier's second case. In this case Smith has strong evidence for believing that Jones owns a Ford. His evidence is that "Jones has at all times in the past owned a car, and always a Ford, and that Jones has just offered Smith a ride while driving a Ford."[10] Smith makes a rudimentary logical inference and says the following:

(h) Either Jones owns a Ford or Brown is in Barcelona

In fact, Smith does not know Brown's location. Still, Smith is justified in believing (h), since Smith inferred it from something else that he is justified in believing. It turns out that (h) it true, but not for the reasons that Smith thinks. The twist in this case is that Jones does not own a Ford, but, by sheer coincidence, Brown is in Barcelona. Many have the strong intuition that Smith fails to know (h). Since Smith is justified in believing (h), we seem to have a counterexample to the JTB analysis.

This case is misleading, according to Mizrahi, because Smith wishes to refer to the person who has always owned a Ford, who has just offered him a ride while driving a Ford, and so on. This is the speaker's referent of 'Jones.' Mizrahi argues that the speaker's referent of 'Jones' must differ from the semantic referent of 'Jones.' Unfortunately for Mizrahi, his argument betrays a serious misunderstanding of Gettier's second case. Mizrahi sets up the case so that Smith comes to have evidence for believing

(f) Jones owns a Ford

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[9] Someone might insist that Smith knows (I**) on independent grounds: there are so many handsome men in the world, it is reasonable to think that at least one of them is getting a job. But we can easily avoid this complication by replacing 'is handsome' with a predicate that applies to fewer people. Then Smith's only justification for believing (I**) would have to do with Jones. Even then someone might insist that Smith knows (I**). I suspect that Christoph Schmidt-Petri would insist that Smith knows (I**), though I am not certain (see "Is Gettier's First Example Flawed?"). Since Schmidt-Petri's remarks on Gettier are complicated, and since I am concerned specifically with Mizrahi's argument, I must set the matter aside. Readers can decide for themselves whether it is plausible to insist that Smith knows (I**).

[10] Gettier, "Is Justified True Belief Knowledge," 122.

and then infers

(g) Either Jones owns a Ford or Brown is in Boston

and then, from (g), infers (h). According to Mizrahi, it is important that this case involves two separate inferences, the first from (f) to (g), and the second from (g) to (h). He argues that "the speaker's reference of 'Jones' is the person who offered Smith a ride, has always owned a Ford, etc., whereas the semantic referent of Jones, i.e., the referent of 'Jones' that makes (g) true, cannot be that person, since Jones does not own a Ford, by stipulation."[11] In the first place, it is not clear why Mizrahi thinks that (g) must be true. But the more salient problem is that Gettier's case does not involve an inference from (g) to (h). Gettier explicitly presents the case so that (h) is inferred directly from (f), by disjunction introduction. The source of Mizrahi's confusion seems to be that Smith also infers (g) from (f). But this is an inessential feature of the case. Gettier introduces (g) only to emphasize the fact that Smith is selecting cities at random. In fact, as Gettier presented the case, Smith also infers the following from (f):

(i) Either Jones owns a Ford or Brown is in Brest-Litovsk.

Again we are not supposed to think that (i) is inferred from (g) or from (h). Instead we are supposed to think that (g), (h), and (i) are each inferred from (f). Smith believes each disjunction, and he is justified in believing each disjunction, since they are each inferred from something else that he is justified in believing. But only (h) happens to be true (unbeknownst to Smith!).

So, contrary to Mizrahi's presentation of the case, (g) is not true, and (h) is not inferred from (g). Furthermore, there are not two separate men, one of whom is the speaker's referent of 'Jones' and one of whom is the semantic referent of 'Jones.' There is only one man, the subject of (f). The case is such that Smith is justified in believing (f), even though (f) is false. We can assume that (f) is false because Jones has lost ownership of his old Ford and "is at present driving a rented car."[12] Nonetheless, Smith has correctly inferred (h) from (f), and (h) is made true by the fact that Brown is in Barcelona. There is no semantic failure in this case. When Smith uses 'Jones,' he is successfully and consistently referring to a single man, the semantic referent of 'Jones.' Mizrahi has provided no reason to suspect that our intuitions about this case are inaccurate, or that this case is ambiguous in any important respect.[13]

[11] Mizrahi, "Why Gettier Cases," 36.

[12] Gettier, "Is Justified True Belief Knowledge," 123.

[13] I am indebted to Rebecca Pluckhorn and Matt Griffin for helpful discussion.