

GETTING GETTIER RIGHT: REPLY TO MIZRAHI

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ABSTRACT: Moti Mizrahi has argued that Gettier cases are misleading, since they involve a certain kind of semantic failure. In a recent paper, I criticized Mizrahi's argument. Mizrahi has since responded. This is a response to his response.

KEYWORDS: analysis of knowledge, Gettier cases, semantic reference, speaker's reference, ambiguous designators, intuition mongering

Moti Mizrahi has argued that Gettier cases are misleading, since they involve a certain kind of semantic failure. In a recent paper, I criticized Mizrahi's argument. Mizrahi has since responded. This is a response to his response.¹

Mizrahi begins his response to me by mentioning some things that he finds peculiar about my critique. I said that Gettier's original two cases are genuine counterexamples to the Justified True Belief analysis of knowledge (henceforth, the JTB analysis). And yet, in replying to Mizrahi's original paper, I revised Gettier's first case. Mizrahi asserts that if I needed to revise this case, then it is not a genuine counterexample. Otherwise why would I need to revise it?

Let me explain how I understand this matter. Gettier cases standardly elicit the intuition that the relevant agent lacks knowledge even though the agent has a justified true belief. If this intuition is accurate, then Gettier cases are genuine counterexamples to the JTB analysis. And when I say that Gettier cases are genuine counterexamples to the JTB analysis, I mean only that they are cases in which the relevant agent has a justified true belief and yet lacks knowledge. Now, Mizrahi tries to call into question the accuracy of the Gettier intuition by arguing that it may result, not from any epistemic failure, but rather from a certain kind of semantic failure. As Mizrahi put it in his original paper, we who have the intuition "may simply be mistaking semantic facts for epistemic facts when we

¹ For the original Gettier cases, see Edmund Gettier, "Is Justified True Belief Knowledge?" *Analysis* 23 (1963): 121-123. For Mizrahi's first paper, see "Why Gettier Cases Are Misleading," *Logos & Episteme* 7 (2016): 31-44. For my response, see "Are Gettier Cases Misleading?" *Logos & Episteme* 7 (2016): 379-384. For Mizrahi's response to my response, see "Why Gettier Cases Are Still Misleading," *Logos & Episteme* 8 (2017): 129-139.

consider Gettier cases.”² If this alternative explanation of the Gettier intuition is correct, then the intuition should be absent when considering Gettier cases where it is clear that there is no such semantic failure. In my response to Mizrahi, I tried to provide such a case by simply tweaking one of Gettier’s original examples, and I then observed that, when considering this case, there remains the intuition that the relevant agent lacks knowledge. This means that Mizrahi’s alternative explanation of the Gettier intuition is incorrect. So, even though I revised Gettier’s first case in replying to Mizrahi, I continue to hold that it is a genuine counterexample to the JTB analysis. I find nothing peculiar about this position.³

In his preliminary remarks, Mizrahi also says that I presented “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.”⁴ This is because, according to Mizrahi, “epistemologists have long recognized that Gettier’s original cases are problematic,”⁵ since these cases involve inferences from false premises, or “false lemmas.” I deny the charges. It is true that epistemologists have long recognized that Gettier’s original cases involve inferences from false lemmas. But it is misleading to say that these epistemologists took Gettier’s original cases to be “problematic,” for these epistemologists generally took Gettier to have been successful in refuting the JTB analysis. In light of Gettier’s counterexamples, some epistemologists were moved to argue that knowledge is actually justified true belief *without false lemmas*,⁶ while others claimed that even this theory succumbs

² “Why Gettier Cases Are Misleading,” 33.

³ Consider an analogy. Suppose that someone tries to explain away my intuition by pointing to the fact that the relevant agent in Gettier’s case is named ‘Smith.’ Since I was recently dumped by someone named ‘Smith,’ I may be holding a grudge and for this reason I may be unwilling to ascribe knowledge to anyone named ‘Smith.’ To rebut this alternative explanation of my intuition, I need only revise the case so that the relevant agent is named something else, and then observe that the agent still seems to lack knowledge. And even though I have revised Gettier’s original case to rebut the alternative explanation, I can coherently hold that Gettier’s original case is itself a counterexample to the JTB analysis.

⁴ “Why Gettier Cases Are Still Misleading,” 130.

⁵ “Why Gettier Cases Are Still Misleading,” 129.

⁶ Michael Clark “Knowledge and Grounds,” *Analysis* 24 (1963): 46-48. David Armstrong went further and suggested that one’s lemmas must not only be true, but known to be true. See his *Belief, Truth and Knowledge* (Cambridge University Press, 1974), 152-154. Both agree that Gettier’s original cases are counterexamples to the JTB analysis. I am aware of very few philosophers who have questioned whether Gettier’s original cases are genuine counterexamples. There is, for example, Joseph Margolis, “The Problem of Justified Belief,” *Philosophical Studies* 23 (1972): 405-409; and Meyers and Stern, “Knowledge Without Paradox,” *Journal of Philosophy* 52 (1973): 147-160. But, unlike Mizrahi, these philosophers readily accept

to Gettier-style counterexamples.⁷ Mizrahi questions why I would neglect to mention these things in my reply to him. The answer is that I was defending the claim that Gettier's original cases refute the JTB analysis, not the claim that they refute the stronger theory that knowledge is justified true belief without false lemmas. To my knowledge, nobody has ever held that Gettier's original cases refute this stronger theory and I am not sure why Mizrahi thinks that I should have discussed it.

A note on terminology. Mizrahi thinks that "refutations" of theories are "conclusive proofs" that those theories are false. When I say that Gettier refuted the JTB analysis, I mean only that he provided counterexamples to the JTB analysis (that is, cases in which the relevant agent has a justified true belief and yet lacks knowledge). This seems somewhat different from saying that Gettier provided a "conclusive proof," since it is always possible that someone will try to explain away our intuitions, which is exactly what Mizrahi tries to do to the Gettier intuition. I will gladly allow that this point is merely terminological. Whenever I say that Gettier refuted the JTB analysis, I can be understood to mean that Gettier's original cases are counterexamples to the JTB analysis. However, there are more substantive differences between Mizrahi and me. He is generally skeptical of appeals to intuitions. In fact, he accuses me of "mere intuition mongering," though it is not clear to me exactly what he means.⁸ My own modest view is that one's intuitions count as good evidence for or against philosophical theories, but they are also defeasible, as all forms of evidence are defeasible. Various things might undermine the evidential weight of an intuition, such as the fact that many others lack the intuition, or a plausible alternative account of why one has the intuition. As I have made clear, I think that Mizrahi's alternative account of the Gettier intuition, whereby it results from some mistake that we are making regarding epistemic facts and semantics facts, does not successfully explain the Gettier intuition. And, though I am sure that there are those who do not have

that the agents in Gettier's cases lack knowledge. Instead, they deny that the agents have formed justified beliefs. Suffice it to say, this position has never been popular.

⁷ See, for example, Ernest Sosa, "The Analysis of 'Knowledge That P,'" *Analysis* 25 (1964): 1-8; John Turk Saunders and Narayan Champawat, "Mr. Clark's Definition of 'Knowledge,'" *Analysis* 25 (1964), 8-9; Richard Feldman *Epistemology* (Prentice Hall, 2003), 31-33. Of course, the debate continues. For a relatively recent discussion, see Michael Levin "Gettier Cases Without False Lemmas?" *Erkenntnis* 64 (2006): 381-391.

⁸ Mizrahi discusses the topic in "Intuition Mongering," *The Reasoner* 6 (2012): 169-170; and also "More Intuition Mongering," *The Reasoner* 7 (2013): 5-6. He does not provide a definition of 'intuition mongering,' so I am left to conclude that he means nothing more than 'relying on our intuitions,' or alternatively 'relying on how things seem to us.'

the Gettier intuition, recent empirical research indicates that it is widely shared across cultures.⁹

Speaking of empirical research, though Mizrahi does not emphasize experimental philosophy in his original paper, he mentions it in his reply to me as evidence that appeals to intuition are “rather controversial.”¹⁰ This despite the fact that recent research indicates that the Gettier intuition is remarkably pervasive, as I mentioned above. In any event, Mizrahi is free to argue against Gettier on the general grounds that philosophical intuitions are unreliable, as suggested, perhaps, by empirical research. But this is not the main argument that he made in his original paper, which was much narrower, and which was the argument that I wanted to rebut. As Mizrahi himself wrote, the main argument of that paper did “not depend on experimental results concerning Gettier intuitions.”¹¹

Before discussing the details of Gettier’s original cases, there is one more preliminary point worth discussing. Mizrahi claims that I denied that Gettier’s original cases involve ambiguous designators. Though I do not believe that ambiguous designators are responsible for the Gettier intuition, I never denied that Gettier’s original cases involve ambiguous designators. Indeed, I purposefully avoided using the expression ‘ambiguous designator’ in my initial reply to Mizrahi. This is because I felt that Mizrahi was using the term in an idiosyncratic way. In fact, though Mizrahi relies on Saul Kripke’s distinction between semantic reference and speaker’s reference,¹² Mizrahi uses ‘ambiguous designator’ in a way that Kripke would not. Remember that Kripke was concerned with the claim that definite descriptions, such as ‘the man drinking champagne,’ are ambiguous, since they can be used attributively or referentially.¹³ Kripke denies that ‘the man drinking champagne’ is ambiguous, at least in the way that ‘bank’ is ambiguous.¹⁴ He argues that the distinction between attributive use and referential use is an instance of a more general distinction, between semantic reference and speaker’s

⁹ Edouard Machery, Stephen Stich, David Rose, Amita Chatterjee, Kaori Karasawa, Noel Struchiner, Smita Sirker, Naoki Usui, and Takaaki Hashimoto, “Gettier Across Cultures” *Noûs* (forthcoming).

¹⁰ “Why Gettier Cases Are Still Misleading,” 131.

¹¹ “Why Gettier Cases Are Misleading,” 32, fn. 4.

¹² Saul Kripke, “Speaker’s Reference and Semantic Reference,” *Midwest Studies in Philosophy* 2 (1977): 255-276.

¹³ Keith Donnellan, “Reference and Definite Descriptions,” *The Philosophical Review* 75 (1966): 281-304.

¹⁴ In general, Kripke is wary of invoking ambiguities in philosophical debates. He writes, “It is very much the lazy man’s approach in philosophy to posit ambiguities when in trouble,” 268. Thanks to Matt Griffin for discussing this point with me.

reference. This distinction applies even to proper names, such as ‘Barack Obama.’ The semantic referent of the name is Barack Obama, the former president, but the speaker’s referent, on a certain occasion of use, might be someone else entirely. And yet, even if there is a divergence between semantic reference and speaker’s reference, it would be inappropriate to conclude that ‘Barack Obama’ is ambiguous. This, anyway, is Kripke’s contention. Mizrahi would say, apparently, that the proper name is ambiguous, since he thinks that divergences between semantic reference and speaker’s reference are indicative of ambiguous designators.

I side with Kripke in thinking that ‘Barack Obama’ is unambiguous. After all, if we say that ‘Barack Obama’ is ambiguous, then we will have to say that *every* singular expression is ambiguous, at least potentially, since every singular expression admits of divergences between speaker’s reference and semantic reference. I am not willing to countenance such an explosion of ambiguities.¹⁵ Ultimately, however, I am inclined to think that the matter is not of central importance. Mizrahi’s main argument can be stated without explicitly mentioning ambiguous designators. That argument is that Gettier cases involve a certain kind of semantic failure, where the semantic referent of a term is different from the speaker’s referent, and that this semantic failure is plausibly responsible for our intuitions regarding Gettier cases. So, according to Mizrahi, those cases are misleading.

Now, let us consider more closely 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 then infers

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

This is true, not because Jones has ten coins in his pocket, but because Smith has ten coins in his pocket and Smith happens to be the man who will get the job. Mizrahi argued in his original paper that ‘coins’ is an ambiguous designator, since the speaker’s referent is the set of coins in Jones’s pocket, which is not the semantic referent of ‘coins.’ I argued that, even if there is a difference here between the speaker’s referent and the semantic referent, it does not plausibly account for the intuition that Smith lacks knowledge. For the case can be easily revised so that Smith instead comes to infer

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

¹⁵ I imagine that Mizrahi would be fine with this explosion of ambiguities. In fact, as we will see, Mizrahi is willing to say that even complex quantificational expressions, such as ‘there is someone who,’ are ambiguous.

It seems that Smith fails to know (I*), and yet it is unreasonable to insist that there is a divergence between the speaker's referent of 'handsome' and the semantic referent of 'handsome.' I considered the possibility that 'the man who will get the job' is such that there is a divergence between the speaker's referent and the semantic referent. Even though Mizrahi did not focus on the definite description, and would not be the first to argue that there is a divergence there between speaker's reference and semantic reference,¹⁶ I noted that the case can again be revised so that Smith infers

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

Intuitively, Smith fails to know (I**), and yet there is no definite description whatsoever.¹⁷ So, even if Gettier's first case involves an ambiguous designator, in Mizrahi's special sense, this fact would not successfully explain away our intuition about the case.

In Mizrahi's response to me, he does not share his intuitive judgment of these cases. He *does* suggest that the intuition that Smith lacks knowledge results from my having been taught that this intuition is the "right" one. It is not clear to me how to respond to such speculation, except to say that, upon serious reflection, I still judge that Smith lacks knowledge in these cases (I am quite capable of thinking for myself). Mizrahi also suggests that the intuition results from the fact that these cases involve false lemmas. Indeed, this is a plausible account of the intuition, insofar as it is a plausible account of why Smith lacks knowledge in these cases. In other words, it is plausible that knowledge requires more than justified true belief. Perhaps it requires the absence of false lemmas.¹⁸ But Gettier never argued otherwise. To repeat what I said above, I am not aware of anyone

¹⁶ Mizrahi himself cited Adrian Heathcote "Truthmaking and the Gettier Problem," in *Aspects of Knowing: Epistemological Essays*, ed. Stephen Hetherington (Oxford: Elsevier, 2006), 151-168; and also Christoph Schmidt-Petri "Is Gettier's First Examples Flawed?" in *Knowledge and Belief*, eds. Winfried Löffler and Paul Weingartner (Kirchberg am Wechsel: ALWS, 2003), 317-319.

¹⁷ I should have mentioned in my earlier paper that this version of Gettier's case is basically the same as Keith Lehrer's Nogot/Havit case. In that case, I have strong evidence for believing that Mr. Nogot, who is in my office, owns a Ford. I then infer that someone in my office owns a Ford. It turns out that someone in my office *does* own a Ford, but, unbeknownst to me, it is Mr. Havit rather than Mr. Nogot. Here I have a justified true belief that someone in my office owns a Ford, but this belief does not count as knowledge. See "Knowledge, Truth and Evidence," *Analysis* 25 (1965): 168-175. Lehrer's case is probably cleaner than mine, since mine requires some minor qualifications regarding the claim that Smith fails to know (I*). See fn. 9 of "Are Gettier Cases Misleading?"

¹⁸ See fn. 6 above.

who has thought that Gettier's original cases refute the theory that knowledge is justified true belief *without false lemmas*. What epistemologists have standardly held is that Gettier's original cases refute the theory that knowledge is justified true belief. This is the position I want to defend against Mizrahi. The stronger theory of knowledge, whereby knowledge requires the absence of false lemmas, is irrelevant here.

Mizrahi proceeds to say that 'someone,' or more fully 'there is someone who,' is ambiguous in (I**). He thinks that the semantic referent is Smith, while the speaker's referent is Jones. It is odd to suggest that the semantic referent of the complex quantificational expression 'there is someone who' is one particular man, but set that issue aside. Mizrahi's main point is that the content of Smith's belief can be interpreted in two ways.

1. There is someone (=Smith) who is getting a job and handsome.
2. There is someone (=Jones) who is getting a job and handsome.

Mizrahi notes that (2) is false and (1) is not believed by Smith. But neither (1) nor (2) is the relevant interpretation of what Smith believes after inferring (I**). The content of Smith's belief is, quite simply, the general proposition *that there is someone who is getting a job and handsome*, not the singular proposition *that there is someone, specifically Smith, who is getting a job and handsome*, nor the singular proposition *that there is someone, specifically Jones, who is getting a job and handsome*.¹⁹ The question is whether *that belief*, whose content includes neither Smith nor Jones, counts as knowledge. Intuitively, the answer is that it does not. Mizrahi might insist that Smith does not actually believe the fully general proposition *that there is someone who is getting a job and handsome*, but this maneuver would be desperate. Why should Smith be cognitively unable to form such a rudimentary belief?

Mizrahi makes one other curious claim about my revision of Gettier's first case. He thinks that Smith must be reasoning as follows:

- a. Jones is getting the job.
- b. Therefore, there is someone who is getting the job.
- c. Jones is handsome.
- d. Therefore, there is someone who is handsome.

¹⁹ Similarly, in the Nogot/Havit case, the content of my belief is understood to be the general proposition *that someone in my office owns a Ford*, not the proposition *that someone in my office, specifically Nogot, owns a Ford*. See fn. 17 above.

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e. Therefore, there is someone who is getting the job *and* there is someone who is handsome.

Mizrahi asserts that “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*.”²⁰ But these remarks are incorrect. To be as explicit as possible, Smith is actually reasoning as follows:

a*. Jones is getting the job.

b*. Jones is handsome.

c*. Therefore, Jones is getting the job and handsome.

d.* Therefore, there is someone who is getting the job and handsome.

Formally, Smith’s line of reasoning could be spelled out as follows:

Gj

Hj

$\therefore Gj \bullet Hj$

$\therefore \exists x[Gx \bullet Hx]$.

Now, it is stipulated that Jones has strong evidence for believing both (a*) and (b*). From (a*) and (b*) he infers (c*), and from (c*) he infers (d*). Each inference is valid and (d*) clearly entails that the one who is getting the job and the one who is handsome are identical.

As for Gettier’s second case, I observed in my initial reply that Mizrahi misinterpreted it, which undermined his case for semantic failure. In that case, Smith has strong evidence for believing that Jones owns a Ford. His evidence is that “Jones has at all time in the past owned a car, and always a Ford, and that Jones has just offered Smith a ride while driving a Ford.”²¹ Smith makes a rudimentary logical inference and says the following:

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

It turns out that (h) is true, not because Jones owns a Ford, but because Brown is in Barcelona. Mizrahi presented the case so that Smith infers (h) from

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

which was inferred from

(f) Jones owns a Ford.

²⁰ “Why Gettier Cases Are Still Misleading,” 135.

²¹ “Is Justified True Belief Knowledge?” 122.

In fact, Smith infers both (g) and (h) directly from (f). Moreover, Mizrahi presented the case, incorrectly, as involving two separate men, one of whom is the speaker's referent of 'Jones' and one of whom is the semantic referent of 'Jones.' As far as I can tell, Mizrahi does not address these mistakes in his reply to me. He does, however, accuse *me* of failing to get Gettier right. In his reply, he presents Smith's reasoning as follows:

- i. Smith has at all times in the past within Smith's memory owned a car.
- ii. Smith has at all times in the past within Smith's memory owned a Ford.
- iii. Jones has just offered Smith a ride while driving a Ford.
- iv. Therefore, Jones owns a Ford.
- v. Therefore, either Jones owns a Ford or Brown is in Barcelona.

Mizrahi then writes: "Contrary to what Atkins suggests, Smith cannot simply make 'a rudimentary logical inference' 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,' namely, addition."²² Well, I agree that (i)-(iii) are Smith's evidence for (iv) and that Smith, after concluding that (iv) is true, infers (v) from (iv). However, I did not say otherwise. As for whether I "suggested" otherwise, I will have to let the reader decide. My presentation of Gettier's case was essentially the same as the presentation that I give above.

I have little space to discuss the other things that Mizrahi says about Gettier's second case, so I will only make a few brief points. While reflecting on the nature of time, Mizrahi observes that a child could not correctly reason as follows:

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

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

"The problem," according to Mizrahi, "is that 'Barack Obama' is referentially ambiguous in this context."²³ Philosophers of language would tend to disagree. The problem is not the proper name, but rather the definite description 'the US president,' which designates different individuals with respect to different times. Regardless, Mizrahi proceeds to argue that 'Jones' is also referentially ambiguous:

²² "Why Gettier Cases Are Still Misleading," 136.

²³ "Why Gettier Cases Are Still Misleading," 137.

“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... makes Gettier’s Case II appear like a genuine counterexample to JTB, even though it is not.”²⁴

So, ‘Jones’ supposedly undergoes a shift in reference, designating one individual and then later designating a different individual. Who specifically are these individuals? The initial referent must be Jones, the man whom Smith remembers as having owned a Ford. But who is the other individual? Mizrahi suggests that it is “the *present* Ford owner.” But if ‘Jones’ designates a Ford owner in (iv), then (iv) would be true, whereas in fact (iv) is stipulated to be false. Perhaps it is the case that ‘Jones’ initially designates *past* Jones and then comes to designate *present* Jones. This is perhaps why Mizrahi writes in his conclusion that “Smith has *past* Jones in mind, for Smith’s evidence is about *past* Jones, not about *present* Jones.”²⁵ At the risk of wading into murky metaphysical waters, I submit that Smith has both past Jones and present Jones in mind, and that his evidence is about both past Jones and present Jones, seeing as how past Jones and present Jones *are the same person*. And if we agree that there is only one individual here, not two separate individuals, then we cannot coherently say that there is a switch in reference.

In any event, Mizrahi’s alternative explanation of the Gettier intuition falls apart if we simply imagine that Jones is currently in the company of Smith. Instead of thinking (iv), based on memory, he comes to the following conclusion, based on direct perception:

(iv*) Jones is standing in front of me.

And then, from (iv*), Smith validly infers

(v*) Either Jones is standing in front of me or Brown is in Barcelona.

Of course, (iv*) is false. Jones is standing behind Smith, but appears to be standing in front of Smith due to some cleverly placed mirrors. Nonetheless, by sheer coincidence, Brown is in Barcelona and so (v*) is true. Surely anyone who agreed with Gettier’s conclusion regarding (v) will come to the same conclusion regarding (v*). Specifically, they will come to the conclusion that Smith fails to know (v*), even though Smith is justified in believing (v*) and it turns out that (v*) is true. And yet here there can be no quibbles about past Jones and present Jones.

²⁴ “Why Gettier Cases Are Misleading,” 138.

²⁵ *Ibid.*

There can be no talk of 'Jones' somehow changing its reference over time. It stands to reason that the considerations adduced by Mizrahi are not responsible for our intuitions about Gettier's second case. A much better account of our intuitions would be that knowledge is not justified true belief.