

EPISTEMIC INTERNALISM, JUSTIFICATION, AND MEMORY

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ABSTRACT: Epistemic internalism, by stressing the indispensability of the subject's perspective, strikes many as plausible at first blush. However, many people have tended to reject the position because certain kinds of beliefs have been thought to pose special problems for epistemic internalism. For example, internalists tend to hold that so long as a justifier is available to the subject either immediately or upon introspection, it can serve to justify beliefs. Many have thought it obvious that no such view can be correct, as it has been alleged that internalism cannot account for the possibility of the justification of beliefs stored in memory. My aim in this paper is to offer a response that explains how memory justification is possible in a way that is consistent with epistemic internalism and an awareness condition on justification. Specifically, I will explore the plausibility of various options open to internalists, including both foundationalist and non-foundationalist approaches to the structure of justification. I intend to show that despite other difficult challenges that epistemic internalism might face, memory belief poses no special problems that the resources of internalism cannot adequately address.

KEYWORDS: epistemology, justification, memory, epistemic internalism

Introduction

Some beliefs are epistemically justified, whereas others are not. But what, exactly, marks this difference? Under what conditions does justification obtain? A related family of views insists on the indispensability of the subject's perspective. As such, these views count themselves as versions of epistemic internalism. While the details vary quite widely, internalists of all stripes hold that only factors internal to the subject, in the relevant sense, can make a justificatory difference. Different senses of the epistemically internal include being things that the subject is, or easily can be, consciously aware of, or mental states internal to the subject.

Some version of these basic requirements strike many as plausible at first blush: being justified in believing something is a matter of (epistemic) reasonableness; (epistemic) reasonableness requires that the subject have reasons for their beliefs; further, what it is to have a justifying reason is, in part, to satisfy an awareness condition, or to be in a certain mental state.

However, despite any *prima facie* appeal internalism might enjoy, certain kinds of beliefs have been thought by critics to pose special problems for the view. For example, internalists tend to hold that so long as a justifier is available to the

subject either immediately or upon introspection, it can serve to justify beliefs. But many have thought it obvious that no such view can be correct, alleging that internalism cannot account for the possibility of the justification of beliefs stored in memory.¹ My aim in this paper is to offer a response that explains how memory justification is possible in a way that is consistent with even the most demanding forms of epistemic internalism.

In section 1, I will formulate what is perhaps the most demanding version of internalism, which will be the subject of this paper. If I am able to vindicate it, I thereby ought to be able to also vindicate weaker and less demanding forms of internalism. In section 2, I shall then clearly outline the challenge for internalism presented from the justification of memory belief. Upon distinguishing different kinds of memory in section 3, I will then put forward the following two different positions as individually sufficient ways of addressing the *prima facie* worry of the justification of memory belief, within an internalist framework:

1. section 4.1 introduces foundationalist strategies, arguing that justification for some memory beliefs is provided by phenomenal states that can be described as memory-seemings, states in which one has an experience of seeming to remember that something is the case;
2. section 4.2 introduces a non-foundationalist version of an approach that holds that a necessary condition of being justified in holding a memory belief is having access to reasons for accepting the particular memory belief in question.

In short, I intend to show that despite other difficult challenges that epistemic internalism might face, memory belief poses no special problems that the resources of internalism cannot adequately address.

1. Epistemic Internalism

Suppose that a belief is justified. In virtue of what is it justified? What kind of ground must a justified belief have, and what kind of access, if any, must the subject have to that ground? Is it enough that the belief is caused in the right way, or must the belief be supported by evidence of some kind of which the subject is, or easily could be, consciously aware? The internalism / externalism distinction in

¹ For example, Sven Bernecker, *Memory: A Philosophical Study* (Oxford: Oxford University Press, 2010); Alvin Goldman, "Internalism Exposed," in *Epistemology: Internalism and Externalism*, ed. Hilary Kornblith (Oxford: Blackwell Publishing, 2001), 207-230; Timothy Williamson, "On Being Justified in One's Head," in *Rationality and the Good*, ed. Mark Timmons, John Greco, Alfred R. Mele (Oxford: Oxford University Press, 2007), 106-122.

epistemology addresses these issues. Internalists hold that all the relevant factors that determine justification must be “internal” (in a sense that needs to be specified). Epistemic externalism is the denial of internalism.

Classical forms of epistemic internalism stress the epistemological significance of consciousness.² Traditionally, epistemic internalism requires that a subject either has conscious awareness of some reason to think that a belief is true, or that the subject could easily become aware of such a reason, upon reflection. However, it is not enough that subjects are merely *aware of* the existence of their grounds; they must *appreciate* the existence and relevance of their grounds to what is believed.³ Specifically, epistemic internalists ought to endorse:

AWARENESS: S is justified in believing that p only if

- i. there is something, X, that contributes to the justification of belief B;
and
- ii. for all X that contributes, S is aware (or potentially aware) *that X contributes to the justification of belief B*.⁴

The primary considerations offered by internalists in favour of AWARENESS are cases of unusual but reliable cognitive faculties, such as the cases of clairvoyance, originally introduced by Laurence Bonjour.⁵

² The other way that epistemic internalism has been understood is in terms of being internal to a subject’s mental life; “Mentalism,” as it is known, holds that a subject’s justification supervenes on her mental states. See: Richard Feldman and Earl Conee, “Internalism Defended,” in *Epistemology: Internalism and Externalism*, ed. Hilary Kornblith (Oxford: Blackwell Publishing, 2001), 231-260; and Earl Conee and Richard Feldman, “Evidence,” in *Epistemology: New Essays*, ed. Quentin Smith (Oxford: Oxford University Press, 2008), 83-104; for other expressions of Mentalism, see also Ralph Wedgwood, “Internalism Explained,” *Philosophy and Phenomenological Research* 65 (2002): 349-369.

³ Otherwise, it has been argued, such weak awareness gives rise to what Michael Bergmann has called the Subject’s Perspective Objection (SPO): roughly, from the subject’s own perspective, it is an accident that what he believes is true, since from his own perspective, the status of his belief is no better than a hunch or arbitrary conviction, or as one might grant, at best a strong but groundless conviction (which is nevertheless incompatible with a belief being justified). For more on the Subject’s Perspective Objection, see Michael Bergmann, *Justification Without Awareness* (Oxford: Clarendon Press, 2006).

⁴ This formulation is similar to Bergmann, *Justification Without Awareness*, 9. However Bergmann’s formulation has been amended to rule out considerations making a justificatory difference if the subjects fail to *appreciate* their existence or relevance to what is believed. For discussion of whether Bergmann’s own formulation captures the kind of awareness relevant for respecting the internalist intuition, see BJC Madison, “Epistemic Internalism,” *Philosophy Compass* 5/10 (2010): 841-842.

In addition to demanding awareness as a necessary condition for justification, traditional internalists ought to think of their position as the conjunction of AWARENESS and DEMON:

DEMON: factors external to the subject's awareness, such as the reliability of the mechanism that gave rise to the belief, are not necessary for the belief to be justified.

DEMON tends to be supported by appealing to what has become known as the New Evil Demon problem.⁶ One form of the argument proceeds by comparing what constitutes justified belief for one who lives in the actual world with what constitutes justified belief for one's counterpart who lives in a demon world, like the one entertained in Descartes' First Meditation. The demon world is one which, by hypothesis, is from our own perspective, just like the actual world. What we experience and believe in the demon world is as it is in the actual world except that crucially, the demon ensures that all of our empirical beliefs are false, and that our perceptual experiences are not veridical.⁷ Nevertheless, internalists point out the intuitive plausibility of holding that the counterparts are equally justified in believing as they do: their beliefs are justified to the very same *extent*, sharing sameness of justificatory status.

Epistemic internalism, therefore, will be understood as any view which endorses the Awareness Requirement, and that holds that factors external to such awareness play no justificatory role. While the most thorough-going epistemic internalism ought to embrace both AWARENESS and DEMON, some authors

⁵ Laurence Bonjour, *The Structure of Empirical Knowledge* (Cambridge, Mass.: Harvard University Press, 1985).

⁶ Keith Lehrer and Stewart Cohen, "Justification, Truth, and Coherence," *Synthese* 55 (1983): 191-207; Stewart Cohen, "Justification and Truth," *Philosophical Studies* 46 (1984): 279-295.

⁷ Some externalists about mental content, however, may deny that such a case is possible. That is, they may deny that there could be a world where a counterpart has all the same beliefs that we do, but that all of their beliefs are false. Since many people hold that some form of content externalism is obviously true, if it is incompatible with epistemic internalism, this would seriously threaten the position. For charges that content externalism and epistemic internalism are incompatible, see for example Duncan Pritchard and Jesper Kallestrup, "An Argument for the Incompatibility of Content Externalism and Epistemic Internalism," *Philosophia* 31 (2004): 345-354; Williamson, "On Being Justified". For replies that the two views *are* compatible, see for example Mikkel Gerken, "Is Internalism About Knowledge Consistent With Content Externalism?," *Philosophia* 36 (2008): 87-96; BJC Madison, "On the Compatibility of Epistemic Internalism and Content Externalism," *Acta Analytica* 24 (2009): 173-183.

have accepted something like AWARENESS but not DEMON;⁸ whereas others accept DEMON but not AWARENESS.⁹

Nevertheless, for the purposes of this discussion, epistemic internalism, as I understand it, is a thesis about epistemic justification that holds that *all* the factors upon which justification supervenes are “internal” to the subject, where the epistemically internal is captured by the conjunction of AWARENESS and DEMON. Externalism will be understood as the denial of internalism.¹⁰ I am focusing on this traditional version of internalism, committed to both AWARENESS and DEMON, since it is the most demanding. I aim to show that the justification of memory belief poses no special problems for even the most demanding forms of internalism. This defense therefore ought to be of interest both to traditional internalists, as well as those who accept weaker versions of the position.

2. Epistemic Internalism and Memorial Justification

When reflecting on two of the primary motivations for epistemic internalism, namely clairvoyance-style cases and the case of the New Evil Demon, internalism might seem most plausible when one considers the justification of perceptual belief. In perception, which is thought of as a paradigm source of justification for beliefs about the external world, conscious awareness seems both epistemically significant, as well as easy to come by.

For example, suppose that one seems to see a lamp on the table in standard viewing conditions, and on that basis believes that there is a lamp on the table. Here one is consciously aware of a ground that justifies one’s belief, namely

⁸ For example Duncan Pritchard, “McDowellian Neo-Mooreanism,” in *Disjunctivism: Perception, Action, Knowledge*, ed. Adrian Haddock and Fiona Macpherson (Oxford: Oxford University Press, 2008), 283-310; Duncan Pritchard, “Evidentialism, Internalism, Disjunctivism,” in *Evidentialism and Its Discontents*, ed. Trent Dougherty (Oxford: Oxford University Press, 2011), 235-253; and arguably John McDowell: see John McDowell, “Criteria, Defeasibility, and Knowledge,” in his *Meaning, Knowledge, and Reality* (Cambridge, Mass: Harvard University Press, 1998), 369-394; John McDowell, “Knowledge by Hearsay,” in his *Meaning, Knowledge, and Reality* (Cambridge, Mass: Harvard University Press, 1998), 414-444; John McDowell, “Knowledge and the Internal,” in his *Meaning, Knowledge and Reality* (Cambridge, Mass: Harvard University Press, 1998), 395-413.

⁹ See Feldman and Conee, “Internalism Defended.”; Conee and Feldman, “Evidence.”; Wedgwood, “Internalism Explained.”

¹⁰ For a recent critical survey of problems and prospects in the contemporary literature on the internalism / externalism distinction in epistemology, as well as for various ways of drawing the distinction, see BJC Madison, “Epistemic Internalism,” 840-853.

having an experience of seeming to see a lamp on the table. One is (or easily can be) aware that one is having this experience, as well as that such an experience justifies the belief in question: seeming to see a lamp on the table provides one with *prima facie* justification to believe that there is a lamp on the table (in the absence of defeaters). In answer to the perfectly reasonable question, “why do you believe that there is a lamp on the table?”, the subject could easily reply that they believe there is a lamp in front of them because they seem to see one. In short, an internalist will maintain that awareness of one’s grounds is a necessary condition of being justified, and that factors external to such awareness are not necessary either: one’s recently envatted counterpart is also justified in believing that there is a lamp on the table if he seems to see one, and this is so even if he is suffering a hallucination that is subjectively indistinguishable from a veridical perception.

Whatever the *prima facie* plausibility of internalism about perceptual justification, many philosophers seem to think that it is utterly *obvious* that epistemic internalism is going to be inconsistent with any plausible account of memory justification, and since it is taken as a datum that many of our memory beliefs are justified (as they surely are), so much the worse for epistemic internalism. For example, in Sven Bernecker’s recent monograph *Memory: A Philosophical Study*, less than two pages are dedicated to a discussion of epistemically internalist conditions on the justification of memory beliefs.

Bernecker’s principal reason to reject internalist accounts is what he calls “the problem of absent justification.”^{11,12} He approvingly quotes Timothy Williamson who sketches the problem as follows: the fact is that many beliefs are ones which may have been based on adequate grounds available to the subject at the time the belief was formed, but as time lapses, the grounds are often forgotten. So, at this later time when the grounds are forgotten, the worry is that the would-be grounded belief is unjustified (which leads to scepticism) because the justifying grounds are no longer available to the subject, even upon introspection.

Explaining the possibility of memory justification and responding to the Problem of Forgotten Evidence are challenges that internalists must meet if they

¹¹ Sven Bernecker, *Memory: A Philosophical Study* (Oxford: Oxford University Press, 2010), 72.

¹² The label “the problem of absent justification” is an unfortunate one, as it is potentially misleading, implying that in the cases in question justification is absent, which is to say that the relevant beliefs are either *unjustified* or else at best non-justified. This is unfortunate since the open question under discussion concerns what kinds of memory beliefs are justified, and if some are, how is this justification possible? Accordingly, referring to these cases as ones of “forgotten evidence” seems more neutral on the question of whether or not such beliefs are in fact justified (cf. Alvin Goldman on what he calls the Problem of Forgotten Evidence: Goldman, “Internalism Exposed.”)

are to provide a general account of epistemic justification. So the question is: in cases of memory justification, what grounds could there be that are accessible to the agent that could satisfy both AWARENESS and DEMON?

Before attempting to answer this question, however, it is important to reflect on the various *kinds* of memory to determine which sorts might be most problematic for epistemic internalism, as well as which might be brought in to the service of internalist epistemology.

3. Kinds of Memory: Some Important Distinctions

It is common to distinguish between at least three different kinds of memory, the latter two of which are relevant to our discussion:

- 1) practical/procedural memory;
- 2) episodic/experiential memory;
- 3) propositional/factual/semantic memory.

Of the three sorts of memory, practical memory concerns retained skills or abilities, rather than doxastic attitudes, and so seems of no threat to epistemic internalism, which is a thesis about the justification of such attitudes.

What has been labeled episodic or experiential memory takes an experience or particular mental episode as its object. One might remember what colour the train was that one took this morning, or what one had for breakfast. In these cases what one remembers is *experiencing* the things in question; one is able to recall one's experience of seeing a red train, or is able to recall one's experience of eating burnt toast.

Given that what is recalled is a particular experience, this kind of memory is also not apt for epistemic justification, any more than states of seeing or hearing are apt for epistemic justification: to ask if one's *seeming to smell* the burnt toast is epistemically justified would similarly be to commit a category mistake. Accordingly, just as perceptual experiences are no potential threat to epistemic internalism, neither is episodic memory as such.

In fact, if it is constitutive of episodic memory states that they involve conscious mental imagery, then when this kind of memory accompanies an instance of propositional memory, it is easy for the internalist to explain how the propositional memory is justified. For instance, one's belief that one took a red train to work might be justified by one's retained, and consciously accessible, perceptual experience of seeming to have taken a red train this morning.

However, such cases of experiential memory might plausibly be thought of as one's *evidence* that justifies one's memory belief (one's state of propositional memory): one has justification to believe that one took a red train to work this

morning on the basis of an experience of taking such a train, and the faculty of memory retains both states. Accordingly, while this form of memory may be a useful resource for an epistemically internalist epistemology of memory, it will be of no help with the specific challenge of the Problem of Forgotten Evidence.

Of the three main kinds of memory philosophers typically distinguish, the most *prima facie* difficult kind to reconcile with epistemic internalism has been variously called propositional, factual, or semantic memory. One feature that distinguishes this sort of memory from others is its object: in cases of propositional memory, what one remembers is a proposition or fact. One remembers *that* $2+2=4$, or *that* London is north of Paris. Unlike episodic memory, one need not have directly experienced the thing in question: one can remember that Napoleon was defeated at Waterloo without oneself needing to have experienced the battle.

On the face of it, the key problem internalists are thought to face with the justification of propositional memory is posed by the combination of two theses:

- i. The vast majority of what we believe is stored in long-term memory; but most of these memory beliefs seem to lack a justifying basis.
- ii. The justification of belief requires a justifying basis; the justification of belief is never a brute fact.

As the Problem of Forgotten Evidence indicates, one can have propositional memory without any accompanying episodic memory, (such as remembering that Napoleon was defeated at Waterloo), but be unable to call to mind how or when one learned this fact. The question, of course, is if such beliefs are justified, and in the present context, if such beliefs are justified, can an epistemic internalist accommodate this fact?

4. Internalist Solutions to the Problem of Memory Justification

I will now show that the internalist has at least two very different broad ways of satisfactorily accounting for the justification of memory belief, depending on if the justification of memory belief is taken to be epistemically basic or non-basic. In section 4.1, I consider a seeming-based view, and argue that states we can describe as memory-seemings can provide immediate, non-inferential justification for beliefs retained in memory. In addition to developing a variation of a view that holds that seemings can justify belief, I distinguish the view from a number of others, and also respond to pressing objections. In section 4.2, I offer an account of memorial justification which denies that such justification is immediate. As I will show, the main objection to this view is based on a confusion. Either way,

whether the justification of memory belief is basic or non-basic, the internalist has the resources to offer an adequate account of each.

By epistemically basic, I mean that a belief is justified in what has been called an “immediate”¹³ or “non-inferential” way, which is to say that while the belief is justified, it is not justified by virtue of other things one believes. Examples of putatively basic beliefs, that is, beliefs not justified on the basis of any others, are ones like $2 + 1 = 3$ or certain beliefs about oneself, such as the belief that one has a headache, when one does, or my belief that I seem to be typing at my computer right now.

If a belief is epistemically non-basic, on the other hand, its justification comes from standing in relation to one’s other beliefs. Alvin Plantinga gives the following examples of non-basic beliefs:

‘umbrageous’ is spelled u-m-b-r-a-g-e-o-u-s; this belief is based upon another belief of mine: the belief that that’s how the dictionary spells it. I believe that 72 multiplied by $71 = 5112$. This belief is based upon several other beliefs I hold: that 1 multiplied by $72 = 72$; 7 multiplied by $2 = 14$; 7 multiplied by $7 = 49$; $49 + 1 = 50$; and others.¹⁴

With this distinction in hand, we can now explore various ways an epistemic internalist can account for the possibility of memory justification.

4.1 Internalists' Responses If Memory Beliefs Are Regarded As Epistemically *Basic*

Internalists Must Reject Preservationism

Just as memory preserves beliefs, some have argued that memory also preserves whatever justification a subject originally had for those beliefs.¹⁵ So, for example, on this view if one acquired sufficient justification to accept some contingent empirical proposition on the basis of testimony at some point in the past, one can

¹³ James Pryor, “There is Immediate Justification,” in *Contemporary Debates in Epistemology*, ed. Matthias Steup and Ernest Sosa (Oxford: Blackwell, 2005), 181-202.

¹⁴ Alvin Plantinga, “Is Belief in God Properly Basic?,” in *Contemporary Perspectives on Religious Epistemology*, ed. R. Douglas Geivett and Brendan Sweetman (New York: Oxford University Press, 1992), 133.

¹⁵ Here I follow Michael Huemer in labeling such views as versions of what he calls “Preservationism” (Michael Huemer, “The Problem of Memory Knowledge,” *Pacific Philosophical Quarterly* 80 (1999): 346-357.) For defenses of preservationism, see for example: David B. Annis, “Memory and Justification,” *Philosophy and Phenomenological Research* 40 (1980): 324-333; Norman Malcolm, *Knowledge and Certainty* (Englewood Cliffs, NJ: Prentice-Hall, 1963); Andrew Naylor, “Justification in Memory Knowledge,” *Synthese* 55 (1983): 269-286; David Owens, *Reason Without Freedom* (London: Routledge, 2000).

still have justification to believe the relevant proposition, even if one cannot now (even *potentially*) recall that one learned it via testimony.

This approach to the justification of memory belief is obviously one that cannot appeal to internalists. Epistemic internalism, as I am construing it, stresses the epistemic significance of consciousness, while holding that factors external to such awareness can play no justificatory role. In the example above, the subject is not aware of anything that could justify the belief, such as its being formed on the basis of testimony. Even if the subject is not even *potentially* aware of anything that could justify the belief, the preservationist will insist that the belief can still be justified, so long as the belief was originally justified and has not been subject to any defeaters – a claim that the internalist must balk at. Also, the preservationist account appeals to facts about the belief's causal history, but these facts must be held to be irrelevant by the internalist, given their commitment to the New Evil Demon case.

To see this, take a subject S and her recently envatted counterpart S*; both seem to remember attending a concert last night, and on that basis both believe that they did attend a concert last night. However, while their memory-seemings are subjectively indistinguishable, only S's memory experience is veridical, in that S did attend the concert the night before, whereas S*'s memory experience is not veridical, but only seems that way due to the meddling of the demon. Nevertheless, the two subjects are equally justified in believing as they do, the internalist will maintain, and so memory justification cannot just be a simple matter of preserving whatever justification the subject originally had.¹⁶

Memory Beliefs Justified By Memory-Seemings: The Positive Proposal

The basic proposal is a simple one: just as *seeming to see* that P justifies the belief that P (in the absence of defeaters), an internalist might hold that *seeming to remember* that P justifies the belief that P (in the absence of defeaters).¹⁷ In order

¹⁶ Huemer, "The Problem of Memory Knowledge," 350 makes a similar point in terms of Bertrand Russell's well known five-minute hypothesis, i.e. the hypothesis that the world was created five minutes ago, replete with all of one's apparent memories. In such a case, the internalist plausibly holds that subjects in the world of the five-minute hypothesis are just as justified in their apparent memory beliefs as we are in ours.

¹⁷ The view I defend in this section is similar to the view that Michael Huemer calls "The Foundational Theory" (Huemer, "The Problem of Memory Knowledge," 348-9). He rejects that view principally because of the consequence of the position that memory can raise justification, as well as a version of the so-called "Epistemic Boost" problem. I defend the view against these two objections below.

to distinguish this proposal from the one above, it is important to note what the proposed justifier or ground is meant to be: it is one's experiential state of seeming to remember, not a remembered experience of any kind. A remembered experience is a piece of episodic memory, and as I indicated above, such experiences seem to have associated imagery.

One's state of seeming to remember something, on the other hand, or a memory-seeming, as I shall call the state, is a kind of experience one can undergo, one with content and a distinctive phenomenology, but one without any associated imagery.¹⁸ Such imagery might accompany a *sensation*, but plausibly sensations and seemings are distinct states of mind, as it seems that there can be seemings without sensations, and vice versa. Take a blindsight case: it might seem to the patient like there is a red square just outside their field of vision, yet they report no sensation of a red square. Conversely, arguably the phenomena of

Huemer calls his own preferred account of the justification of memory belief "The Dualistic Theory" (Huemer, "The Problem of Memory Knowledge," sec. 4). It is dualistic since it aims to incorporate *both* the foundational view and the preservationist view of memorial justification. Huemer holds that seemings can bring about *prima facie* justification for a memory belief, but only if that is the way that the subject comes to acquire the belief in the first place; otherwise, Huemer insists that past justificational states can matter to current justificatory status. In so doing he also thereby incorporates preservationism. In effect I think that Huemer is on the right track, insofar as he allows memory seeming-states to play a foundational role; however, his dualistic view is unavailable to internalists as it incorporates preservationism, which as I have argued above, they must reject. Huemer himself acknowledges that his dualistic theory "cannot maintain the supervenience of epistemic justification on the current, intrinsic state of the believer", which is a thesis internalists will want to endorse (Huemer, "The Problem of Memory Knowledge," 352). A key aim of mine, therefore, is to defend the internalist's foundational view in light of objections raised by Huemer et al.

¹⁸ For recent discussion of what seemings are, as well as the thesis that they are justificatory, see for example Chris Tucker, "Why Open-Minded People Should Endorse Dogmatism," *Philosophical Perspectives* 24 (2010): 529-545; Chris Tucker, "Phenomenal Conservatism and Evidentialism in Religious Epistemology," in *Evidence and Religious Belief*, ed. Kelly James Clark and Raymond J. VanArragon (Oxford: Oxford University Press, 2011), 52-76; Chris Tucker, "Seemings and Justification: An Introduction," in *Seemings and Justification: New Essays on Dogmatism and Phenomenal Conservatism*, ed. Chris Tucker (Oxford: Oxford University Press, 2013), 1-29; Andrew Cullison, "What Are Seemings?," *Ratio* 23 (2010): 260-274; Michael Huemer, "Phenomenal Conservatism," in *Internet Encyclopedia of Philosophy* (2013): <http://www.iep.utm.edu/phen-con/>. For critical discussion, see for example Clayton Littlejohn, "Defeating Phenomenal Conservatism," *Analytic Philosophy* 52 (2011): 35-48; Peter Markie, "The Mystery of Direct Perceptual Justification," *Philosophical Studies* 126 (2005): 347-373; Peter Markie, "Epistemically Appropriate Perceptual Belief," *Noûs* 40 (2006): 118-142; as well as a number of papers in *Seemings and Justification: New Essays on Dogmatism and Phenomenal Conservatism*, ed. Chris Tucker (Oxford: Oxford University Press, 2013).

associative agnosia is a case of sensation without seeming: patients suffering from this condition seem to be able to remember familiar objects like pens and rings, but they are not able to recognize these objects *as* pens and rings; they have sensations of rings and pens, but these objects do not *seem* to them to *be* rings and pens.¹⁹

The proposal I am advancing here might seem to amount to Phenomenal Conservatism. Phenomenal Conservatism is the following thesis about justification: if it seems to S that P, then in the absence of defeaters, S has propositional justification for P.²⁰ Phenomenal Conservatism is a form of epistemic internalism since it satisfies DEMON: the Phenomenal Conservative holds that demon world subjects are as justified as their normal world counterparts, so long as all the same things seem the same to them: as long as there is no difference in seemings, there is no difference in justification. Phenomenal Conservatism also puts epistemic weight on the subject's perspective, by holding that how things seem to the subject can confer justification.

But despite these similarities, Phenomenal Conservatism does not insist on AWARENESS, which recall asserts that:

AWARENESS: S is justified in believing that *p* only if

- i. there is something, X, that contributes to the justification of belief B;
and
- ii. for all X that contributes, S is aware (or potentially aware) *that X contributes to the justification of belief B.*

While Phenomenal Conservatism meets the first conjunct, it does not meet the second: it does not require that the subject be aware of his seeming as a seeming, or that the subject is aware (or even potentially aware) that this seeming contributes to the justification of his belief. As such, traditional internalists will hold that Phenomenal Conservatism is too weak, as it can give rise to what Michael Bergmann calls the Subject's Perspective Objection (SPO): roughly, from the subject's own perspective, it is an accident that what he believes is true, since from his own perspective, the status of his belief is no better than a hunch or

¹⁹ See Tucker, "Why Open-Minded People Should Endorse Dogmatism," 530-531 for the introduction and discussion of these examples. For general discussion of the distinction between seemings and sensations, see for example Ibid. sec. 1; Tucker, "Phenomenal Conservatism and Evidentialism in Religious Epistemology," sec. 2.2; Tucker, "Seemings and Justification: An Introduction."

²⁰ Tucker, "Phenomenal Conservatism and Evidentialism in Religious Epistemology," 55.

arbitrary conviction, or as one might grant, at best a strong but groundless conviction (which is nevertheless incompatible with a belief being justified).²¹

But in addition to the Subject's Perspective Objection, intuitively, only certain kinds of seemings are relevant to the justification of certain kinds of beliefs, something that Phenomenal Conservatism fails to take account of. For instance, as noted above, it seems possible that a subject might suffer from blindsight: in such a case, a subject might genuinely be visually perceiving a material object, and they might report that the object seems to them to be before them, although from their point of view, it would not seem like an episode of seeing at all. If a subject did form a belief on the basis of such perception, traditional internalists would judge the belief unjustified, as it is structurally parallel to a case of clairvoyance.

In the classic clairvoyance case, while it might seem to Norman the clairvoyant that the President is in New York since he feels very sure of it, he is not justified in accepting this proposition on that basis. From Norman's own perspective, the status of his belief is no better than a hunch or arbitrary conviction, or as one might grant, at best a strong but groundless conviction. If the belief turns out to be true, then from Norman's point of view, that is accidental, given what he is aware of. Similarly, if there are states of memory that mirror the blind sight phenomenon, in that there is nothing that it is like for the subject to be in the memory state, resulting in the subject being unable to recognize the state as a seeming-memory, then so too should an internalist hold that such memory beliefs are unjustified.

So what is similar between the view I am advancing and Phenomenal Conservatism is the contention that seeming to remember that P can provide justification for a subject to believe that P. A Phenomenal Conservative would agree with that, since they hold that all seemings that P provide some *prima facie* justification for the belief that P. I am suggesting that where we differ is that, in particular, it is the seeming-to-remember that P that justifies the memory belief that P – it is not enough that P just seems true to the subject: it must also seem to the subject like an instance of remembering. This is needed to satisfy AWARENESS.

To clarify, I do not claim that, necessarily, *all* memory states have these distinctive phenomenal features: perhaps some memory states lack them. What I am contending is that if there are memory experiences that cannot be recognized

²¹ See Bergmann, *Justification Without Awareness* for the introduction of the Subject's Perspective Objection, as well as for an extended argument that the SPO both motivates, and puts constraints upon, the correct formulation of epistemic internalism.

as such from the first-person perspective, they cannot justify memory beliefs based on them, any more than an internalist will grant that perceptual beliefs can be justified by perceptual states that cannot be recognized as such from the first-person point of view (e.g. as seen in blindsight and clairvoyance cases). So while it may be an empirical question if all memory experiences have “memory markers” – intrinsic features of the experience that indicate that the experiences provide information about the past – it is an a priori question which memory experiences, if any, *justify* belief.²²

As we have noted, the state of seeming to remember that P is an experiential state with P as its content. As it is an experiential state, rather than a doxastic one, it is able to foundationally ground beliefs, thus rendering them epistemically basic. What in part makes the state one of *seeming* to remember is not its content, however, but rather its distinctive phenomenal properties. This allows one to (fallibly) distinguish, from the first person perspective, seeming to remember that P, from other states with the same content, such as wishing that P, or hoping that P, etc. It must be granted that seeming to remember something has a distinctive phenomenology. That is, there is ‘something that it is like’ to seem to remember something, since otherwise, we would be unable to identify a state as a putative memory state from the first person perspective, which is obviously something that we are able to do. Seeming to remember something does not seem

²² Sven Bernecker has criticized positions which hold that, necessarily, memory experiences have memory markers, as well as epistemic views that contend that what *constitutes* a state as one of (veridical) memory is the presence of a memory marker, rather than some extrinsic, relational feature of the state, such as having been caused in the right kind of way by some previous representation and retained (see Sven Bernecker, *The Metaphysics of Memory* (New York: Springer, 2008), ch.6). I need take no official stand on these issues here. Rather, the position I aim to defend is that for all clear cases of *justified* memory belief, the subject is, or easily can be, aware of an experiential state of seeming-to-remember, one that can be recognized as such from the subject’s perspective, partly in virtue of the state’s phenomenal features. As Bernecker himself concedes, “It is an undeniable fact that some of our memory experiences have a recognizable feeling of familiarity about them, and that it is that which distinguishes them from other experiences. The trouble with Russell’s proposal as with others of its kind, is that it does not offer a *reliable* mark.” (original emphasis) (Bernecker, *The Metaphysics of Memory*, 91) But it should not trouble the internalist if these phenomenal features are not an infallible way, or are perhaps not even always a reliable way, of distinguishing veridical from mere seeming memories, or for distinguishing memory from other kinds of states. Given internalist commitments, reliability is neither necessary nor sufficient for justification. What matters for the internalist is the presence of some justifying ground that can satisfy AWARENESS and DEMON, which I shall argue is something that experiences of seeming to remember are able meet.

to one like hoping or wishing that it is the case. When one attempts to recall what one did in the distant past, and then seems to remember what one did, without calling to mind any retained perceptual experience or imagery of any kind, the content of what one seems to recall strikes one as, among other things, true, familiar, and seemingly acquired in the past.

However, some have claimed that memory *beliefs* themselves have a distinctive phenomenology.²³ Some have suggested that these phenomenal properties, or what has been termed the state's "feel," provides one with a defeasible reason for belief.²⁴

It is important to distinguish the view I am advancing here from this one where it is held that phenomenal properties of a memory belief justify it. While I agree that there are distinctive phenomenal features which are epistemically important for the justification of memory belief, I am not suggesting that they attach to the memory *belief* itself – rather, the properties are properties of the *experience* of seeming to remember something.²⁵ Also, it is not these properties *alone* which justify belief, as Phenomenal Conservatism maintains, but rather, it is

²³ Robert Audi, "Memorial Justification," *Philosophical Topics* 23 (1995): 31–45; Alvin Plantinga, *Warrant and Proper Function* (Oxford: Oxford University Press, 1993), 59.

²⁴ Robert Schroer, "Memory Foundationalism and the Problem of Unforgotten Carelessness," *Pacific Philosophical Quarterly* 89 (2008): 75–76.

²⁵ The view that I am suggesting is preferable to the one where it is held that a particular feel of a memory belief justifies it. First, is it true that *beliefs* have a phenomenology? Secondly, suppose that some beliefs do have a kind of "feel", as some have thought. How could a mere *feel*, in itself, be a rational reason to believe something? A feel might *cause* a belief, or perhaps together with some other claim about such feels, one might infer some proposition and hence be non-foundationally justified in believing it on the basis of a feel, but it is difficult to see how a merely qualitative feel or sensation could stand in a genuinely rational relation to a content. A final advantage of holding that it is an experience of seeming to remember that P that justifies belief that P, rather than the mere "feel" of a memory belief that justifies it (granting for the sake of argument that beliefs can have such a feel), is that the analogy with foundational perceptual justification is maintained. In the visual case, a foundationalist holds that it is one's state of seeming to see that P that gives one justification to believe that P, rather than holding that one's justification comes from some phenomenal properties alone of the belief itself. The latter scarcely makes sense, especially by internalist lights: the idea would be, for example, that one's belief that there is a tin on the table could be justified by some feel associated with the belief itself, e.g. perhaps if one was subjectively quite certain that the tin was on the table. In short, since memory foundationalists in part ought to argue for their position by analogy with the case of perceptual justification, they ought to hold that it is the experience of seeming to remember that P that provides justification to believe that P, just as it is the experience of seeming to see that P which justifies the belief that P, in the absence of defeaters.

an experiential state of seeming to remember, complete both with its phenomenal properties and particular content, that are taken to justify memory belief.

While it is not in virtue of phenomenal properties alone that memory beliefs can be foundationally justified, that is not to say that such properties play no epistemic role. For one thing, as I noted above, these properties allow the subject to distinguish memory-seemings from other experiential states from the first-person perspective. Given that internalism as I am construing it insists that subjects must be able to recognize their epistemic reasons as such in order to satisfy the awareness requirement, memory-seemings having these distinctive phenomenal properties is epistemically indispensable.

My proposal thus far has been that *seeming to remember* that P justifies the belief that P (in the absence of defeaters). Finally, it is important to further still distinguish this view from one introduced, but then rejected, by John Pollock in the first edition of *Contemporary Theories of Knowledge*.²⁶ In that work, Pollock considers and rejects a view that is superficially similar in some ways to the one I propose here in the course of his discussion of foundationalist theories of reasoning and memory. On the view considered, Pollock allows that the *process* of remembering itself confers justification on memory belief, and not its original grounds. Therefore, this view too is incompatible with Preservationism. And like the view I have advanced, this view holds that the experience of seeming to remember something is a discrete mental state that has an introspectively distinguishable characteristic; holding a belief on the basis of memory *feels* different than from holding it on no basis at all, or on the basis of perception, for example.²⁷

Despite these similarities, a key difference between the view I offer here, and the one that Pollock introduces and rejects, is that I maintain that a memory belief can be justified immediately, non-inferentially, by an experience I am calling a memory-seeming. Pollock's account, on the other hand, suggests that memory beliefs would be *non-basic*. On the view Pollock considers, memory provides us with beliefs about what we seem to remember, and *then* we infer the truth of what is remembered (non-basic) from the *beliefs* about apparent memories.²⁸ By contrast, as I have been stressing, on my account, the memory-seemings themselves, not beliefs about them, are one's justificatory grounds.

²⁶ John Pollock, *Contemporary Theories of Knowledge* (Lanham: Rowman and Littlefield, 1986).

²⁷ Pollock, *Contemporary Theories of Knowledge*, 51.

²⁸ Pollock, *Contemporary Theories of Knowledge*, 51.

Memory Beliefs Justified By Memory-Seemings: The Objections

Objection 1: Non-Occurrent Seemings?

Against the thesis I am proposing, one might press the following worry: it is very unclear how memorial-seemings address the key problem with respect to memorial justification, for the following reason. If seemings are necessarily occurrent and conscious, then we presumably have very, very few of them at any given time. Consequently, memorial seemings can explain, at the relevant time, how only a very, very small subset of our memorial beliefs are justified, which is tantamount to skepticism.²⁹

This objection presupposes that seemings are necessarily occurrent. But why think that? As a kind of experience, seemings can go unnoticed, unattended to. $2+2=4$ seems obviously true to me. It seems true now when I consider it, but I submit that it also seemed true to me a moment ago, before actively reconsidering it. Just as I now also occurrently believe that $2+2=4$, a moment ago I dispositionally believed it as well. It is not that I merely had a disposition to believe that $2+2=4$, which is also true, but I already held the belief dispositionally. When I now occurrently believe that $2+2=4$, I do not form the belief for the first time, as it were; rather, I am now consciously entertaining a belief that was dispositionally held. In general, we allow that beliefs and experiences can be had occurrently or dispositionally; so too, we should allow, with seemings.

But suppose that our objector continues as follows: granted, seemings are not necessarily occurrent; one can have a dispositional seeming, i.e. a seeming that is not occurrent. But if we allow seemings to exist without being occurrent and conscious, then they cannot have their phenomenal character essentially. Would that not then raise the question of how they do any justificatory work?

We can respond to this worry in at least two ways: on one understanding, the claim that seemings have their phenomenal character essentially might be true. But it need not follow from this that necessarily one is always consciously aware of the experience and its character. Perhaps a seeming might not seem any particular way to the subject at a time, if only because she does not attend to it.

But what if the seeming does not have its phenomenal character essentially? In that case, we can still allow that a seeming can justify, but only when one is, or easily can be, aware of it. Such seemings still satisfy AWARENESS. What the internalist needs to rule out is that states that necessarily fail the awareness condition can ever be justifiers. Internalism, construing it, as I do, in terms of

²⁹ Thanks to Chris Tucker for impressing upon me the need to consider this objection.

AWARENESS, puts a necessary condition on justification. What AWARENESS in part does is spell out what it is to have a justifying reason. Memory-seemings can at least sometimes satisfy this condition, and when they do, they can justify memory belief. But it is no part of internalism in general, or the internalist picture of the justification of memory beliefs in particular, that memorial-seemings necessarily have a particular phenomenal character, or if they do, that it must always be consciously present to the subject.

Objection 2: Can Memory Really Raise Justification?

At this point one might object that the view being presented here, one that makes use of memory-seemings, has the untoward consequence that the faculty of memory can raise the justification a belief had, over and above the justification one originally had for it.^{30,31} For instance, suppose at t_1 , some time in the distant past, one comes to believe that P on the basis of justificationaly sufficient, yet rather weak, evidence. Suppose also that at t_2 , the present, one has since forgotten one's original evidence, but it now seems utterly obvious to one that P is true – upon introspection, one has an experience of seeming to remember that P . Is it problematic to hold that one is now justified, and perhaps more justified in believing the original proposition, especially since the alleged improvement in epistemic status is said to come from forgetting one's original evidence? How could one kind of epistemic failure result in another kind of epistemic improvement, one might wonder?

While the view sketched here does have the consequence that memory can raise justification, it is difficult to see what the principled objection might be. It should be generally and un-problematically accepted, for example, that one can come to be less justified by coming to believe more things, either in a simple case

³⁰ Huemer, "The Problem of Memory Knowledge," Section 2; Thomas D. Senior, "Internalistic Foundationalism and the Justification of Memory Belief," *Synthese* 94 (1993): 453-476.

³¹ Jennifer Lackey has argued that not only can the faculty of memory *raise* the epistemic status of a belief, but it can *generate* positive epistemic status as well (Jennifer Lackey, "Memory as a Generative Source," *Philosophy and Phenomenological Research* 70 (2005): 636-658). See in particular section 3 of that paper for cases of justification being generated because of forgotten defeaters. I myself find Lackey's cases convincing, but for my purposes here, I am only committed to the weaker claim that memory can *raise* justification, which I defend below, rather than generate it anew. For a response to Lackey, see Thomas D. Senior, "Preserving Preservationism: A Reply to Lackey," *Philosophy and Phenomenological Research* 74 (2007): 199-208; for Lackey's reply, see Jennifer Lackey, "Why Memory Really *Is* a Generative Epistemic Source: A Reply to Senior," *Philosophy and Phenomenological Research* 74 (2007): 209-219.

of discovering disconfirming evidence against an inductive claim, or by acquiring defeaters for a belief. If one is justified in believing that the table before one is red based on how it looks, for example, this justification can be undermined by believed testimony that the table is white, but being illuminated with red light. If acquiring defeaters can lower justification, why should it be surprising that losing defeaters can raise justification?

If it is correct in general that losing defeaters can raise justification, why should it make an epistemic difference if the defeater is lost by being defeated by a further consideration, or if the defeater is lost by being forgotten? (Assuming that it is not forgotten intentionally, or in some way that is epistemically blameworthy.) In either case its defeating force should be neutralized. In the case above, if one went on to acquire a defeater-defeater for the testimony that the table is white under red light, such as further testimony from a reliable shop foreman that the first piece of testimony was part of a practical joke, one's justification that the object was red would be restored.

In a similar way, if the table still looks red to one, but one (non-culpably) forgets the testimony that asserted that it was white under strange lighting conditions, it seems that one's prima facie justification that one is looking at a red object would be restored. If this is right, it seems plausible in turn that one might seem to remember that one has seen a red table, despite one's having forgotten both one's experience of seeming to see it, as well as any defeaters one might have had for the belief when one originally acquired it. Nevertheless, one's belief that one has seen a red table enjoys some degree of justification if it is epistemically based on a memory-seeming, complete with state's distinctive memorial phenomenology and content. Granted, such a belief may be less justified than it would have been if one had retained one's original episodic grounds. Also, such a belief may be less justified than it would have been when based on occurrent, conscious perceptual experience. Still, factual memory, even if a case of forgotten evidence, may be justified all the same, and justified in a way consistent with epistemic internalism.

A closely related worry is what Matthew McGrath calls the "epistemic boost" problem.³² The worry is that the view I am presenting here generates the counterintuitive result that the faculty of memory can "boost" the justification a belief had, over and above the justification one originally had for it. The worry is this: one might think it implausible that each and every time a belief is retrieved from memory it receives an extra epistemic boost due to the epistemic import of

³² Matthew McGrath, "Memory and Epistemic Conservatism," *Synthese* 157 (2007): 19-22.

the experience of seeming-to-remember, over and above the belief's initial good grounds. As Sven Bernecker puts it,

Suppose that S initially comes to believe that P by means of an a priori proof. The next day S still remembers P and the proof of it. But since he also has the experience of seeming to remember that P, he now has two reasons for holding P true, an inferential and a foundational one. Thus S has more justification for P now than he had at the original learning.³³

The potential oddness here can be explained by the ambiguity surrounding what is meant by having “more” justification once the belief is seemingly remembered. It would perhaps be odd if the strength or amount of justification were raised in such cases. But a perfectly natural and unproblematic way of interpreting what it is to have “more” justification is in terms of the sources of justification. Here one's belief is justificationaly overdetermined in the sense that it has two independent sources of justification, each of which is individually sufficient for the justification of the belief in question.

So one's justification is not strictly speaking boosted in the cases in question; rather, it is reinforced, and nothing about such reinforcement is counterintuitive. Compare a non-memory case: for example, suppose that one believes that a red bird is in the garden, justified by one's seeming to see it. Suppose further that someone then comes by and tells you, while you are still looking at the bird, “there is a red bird in the garden.” Does this piece of testimony now boost your justification over and above the level of justification established by one's perceptual evidence? We are not required to say that it does. One may have more justification, but only in the sense that one's belief about the red bird in the garden is justificationaly overdetermined: one's belief now has two independent sources of justification, each of which is individually sufficient for justified belief. So the so-called epistemic boost problem turns out to be no problem at all.³⁴ We are still left with the result that factual memory cases of forgotten evidence may be justified in a way consistent with epistemic internalism.

Objection 3: Moon on Epistemic Internalism and Evidence

Finally, it is worth examining recent criticism of epistemic internalism raised by Andrew Moon,³⁵ since on the face of it, his arguments might be thought to threaten the position I defend here. Seeing why Moon's central argument, even if

³³ Bernecker, *The Metaphysics of Memory*, 120.

³⁴ For two more possible responses to the epistemic boost problem, see McGrath, “Memory and Epistemic Conservatism,” 20-21.

³⁵ Andrew Moon, “Knowing Without Evidence,” *MIND* 121 (2012): 309-331.

sound, fails to undermine the position I defend here will help clarify internalism's essential commitments. Moon argues against what he calls the Evidence Thesis, as well as a particular internalist understanding of evidence (a principle he labels IUE). Specifically, the principles Moon targets are the following:

Evidence Thesis: S knows that P at t only if S believes that P on the basis of evidence at t.

IUE: S believes that P on the basis of evidence E at t only if S can become aware that he has E by way of introspection at t.³⁶

Moon aims to undermine the Evidence Thesis by way of counterexample. The constraints that Moon places on what will make a cogent counterexample are twofold: first, the case must clearly be one where a subject has knowledge, and second, it must be clear that the knowledge is not based on any evidence.³⁷ Given these constraints, Moon presents his example as follows:

Tim, a freshman college student enrolled in an introductory logic course, is asked to consider for the first time the law of non-contradiction, the proposition that *for any proposition p, it is not the case that p and not-p*. The proposition seems clearly true to him and he comes to believe it. Tim immediately lies down and falls asleep from all the excitement.³⁸

Moon standardizes the argument as follows:

- (1) Tim knows that *the law of non-contradiction is true* (LN) while he naps (Premise)
- (2) Tim does not believe LN on the basis of any evidence while he naps. (Premise)
- (3) Tim knows that LN while he naps, and he does not believe LN on the basis of any evidence while he naps (1, 2).³⁹

The above conclusion is inconsistent with the Evidence thesis; thus if (3) is true, then the Evidence Thesis is false.

First, it is not clear that Moon's example, if successful, would count against the internalist treatment of memory belief that I am giving here. First, his target is specifically *knowledge*, whereas my focus throughout is on epistemic *justification*. While I am not committed to it here, I am open to the possibility that perhaps there are some cases of knowledge without justification: maybe instances of knowledge while asleep are some such cases.

³⁶ Moon, "Knowing Without Evidence," 309.

³⁷ Moon, "Knowing Without Evidence," 311.

³⁸ Moon, "Knowing Without Evidence," 312.

³⁹ Moon, "Knowing Without Evidence," 312.

Second, and more importantly, suppose Moon's case is a successful counterexample to the principles he formulates: would this undermine any form of epistemic internalism worth endorsing? While Moon asserts that "virtually all epistemic internalists affirm" the Evidence Thesis and a particular understanding of evidence, not a single reference is given to the work of any of these people (though many references are provided for those who *reject* these principles).⁴⁰ I suspect that this is because no internalist does (or should) accept these theses.

While an internalist might give an account of knowledge that incorporates internalist elements, such as a justification condition, it is widely held that no purely internalist treatment of knowledge can be given. As has been made especially clear in the post-Gettier era, knowledge requires that at least some epistemically external conditions obtain, e.g. truth, an anti-luck condition to handle Gettier cases, as well as crucially for our purposes here, as we shall see, the basing relation.

Moon supposes throughout his discussion, and many will agree, that for the basing relation to obtain, that is, for a belief to be held on the basis of some ground, it requires (at least in part) that the belief is non-deviantly *caused* and / or *causally sustained* by that ground (details of the accounts vary⁴¹). But causal relations are paradigm cases of the kinds of things that are not accessible to the subject through reflection alone. Accordingly, no epistemic internalist should endorse Moon's IUE: whether or not S believes that P on the *basis* of evidence E at t is *not* the kind of thing that depends on whether S can become aware that he has E by introspection. If standard conceptions of the basing relation are correct, whether P is based on E depends, at least in part, on a causal relation, and one cannot tell by introspection alone whether a causal relation obtains between one's belief and one's evidence. For example, suppose that S's superstitious beliefs non-deviantly cause him to believe that P; S's belief that P is thereby based upon his superstitious beliefs. Everyone, including internalists, should allow that this can be so even if S is aware of no evidence for P upon introspection, or even if S would appeal to, cite, or otherwise become aware of some *other* evidence E upon reflection.

How then ought internalists think of the relation between evidence and their position? First, internalism should be thought of as fundamentally a thesis about epistemic justification, not knowledge. As I indicated above, internalists

⁴⁰ Moon, "Knowing Without Evidence," 310-11.

⁴¹ For a recent overview, see Keith Allen Korcz, "The Epistemic Basing Relation," in *The Stanford Encyclopedia of Philosophy (Spring 2010 Edition)*, ed. Edward N. Zalta, <http://plato.stanford.edu/archives/spr2010/entries/basing-epistemic/>.

should hold that it is a necessary condition of being epistemically justified in believing that P that the subject is, or easily could be, aware of some evidence in support of that belief. To be an internalist about knowledge, therefore, would simply be to insist on the requirement that (internalist) justification is required in addition to whatever epistemically external conditions are needed for knowledge.

Second, while *knowledge* requires that a subject bases her belief upon her grounds, internalists ought to stress that their primary concern is not with *doxastic* justification, which requires proper basing, but rather, is with *propositional* justification.⁴² That is, it is important to note that not all epistemologists, internalists and externalists alike, cast their theory of justification in terms of justified *belief* (doxastic justification). Often their concern is with, as Jim Pryor puts it, “whether you have justification for believing certain *propositions* – regardless of whether you actually do believe those propositions.”⁴³ (emphasis in original) I shall follow convention and call this kind of justification *propositional justification*.⁴⁴ The upshot of this distinction is that one can have justification to believe things that one does not actually believe; also, one can believe things that one has justification to believe, but fail to believe *with* (on the basis of that) justification.

To illustrate, consider a subject who reads a reliable report that predicts that mortgage rates will fall. The subject now has justification to believe this, even if he never happens to form the belief that mortgage rates will fall. Suppose, on the other hand, that the subject does come to believe that mortgage rates will fall, although what causes him to believe this is wishful thinking on his part, and not his having read a reliable report. Here the subject’s belief is propositionally justified, since he has good reason to believe it; on the other hand, his belief is not doxastically justified, since he does not believe it on the basis of his good reason, but rather he believes it on the basis of his wishful thinking. As I noted above, typically it is held that the basing relation, which is usually taken to be, at least in

⁴² For discussion, see for example Ted Poston, “Internalism and Externalism in Epistemology,” in *The Internet Encyclopedia of Philosophy*, 2008, <http://www.iep.utm.edu/int-ext/>, section 1b.

⁴³ James Pryor, “Highlights of Recent Epistemology,” *British Journal for the Philosophy of Science* 52 (2001): 104.

⁴⁴ Others use different terminology to express the same basic distinction. For a discussion of “well-foundedness” as a way of characterizing this distinction, see Richard Feldman and Earl Conee, “Evidentialism,” in their *Evidentialism* (Oxford: Clarendon Press, 2004), 83-100. However the distinction is labeled, when specifying and evaluating different theories of justification, it is important to make explicit whether we are evaluating justification for *propositions* relative to a person at a time, or *beliefs* that a person actually holds. Internalism ought to be thought of as a theory of propositional justification.

part, a causal relation, marks the difference between a propositionally justified belief and a doxastically justified belief (where doxastic justification is propositional justification plus proper basing).

Given this distinction, the internalist understanding of evidence ought to be construed as follows: S is (propositionally) justified in believing that P only if the subject, is, or easily could be, aware of some evidence in support of that belief. Whether the subject's belief is doxastically justified, that is, whether the subject *bases* his belief upon the propositional justification that he enjoys, is not something that the subject can be aware of upon reflection alone. Therefore, neither an internalist, nor anyone else for that matter, ought to endorse such a view.

With these points in mind, we can see that Moon's example of Tim the logic student, and modified variations of it, pose no threat to epistemic internalism, properly understood. Suppose for the sake of argument that it is the seeming obviousness of the law of non-contradiction that justifies Tim in accepting it – that is, it is not his *belief* that it seems obvious that the law of non-contradiction is true, but that it is the *experiential state* of its seeming obviously true that justifies Tim in accepting his belief about the law of non-contradiction. His belief is propositionally justified, since he possesses good reason to believe it. Even when sleeping, Tim has this justification, and the awareness condition is satisfied: he is, or in this case, easily could be, aware of some reason to think that his belief is true, namely: his remembering its having seemed to him that the law of non-contradiction is true. Even when asleep, we may suppose, a subject is able to retain the memory that it seemed to the subject that P, as Moon himself concedes.⁴⁵ Here the internalist will suggest, as Moon will allow, that even when asleep the subject has a memorial-seeming which plays a justificatory role. This is so even though he is not presently aware of this experience, since he is in a dreamless sleep, we may suppose, and so is consciously aware of nothing.

This further highlights that it is ambiguous what 'a seeming' refers to: there is the occurrent sense, as well as a non-occurrent sense. The non-occurrent sense refers to the experiential state of its seeming to the subject that P, even though the subject is not presently aware of the state. To add a further example, I can retain in memory that it seems to me that torture for fun and profit is wrong, even when asleep. This is a case where it seems to me that P, even though asleep: when in a dreamless sleep, this seeming does not (occurrently) seem any way to me, so to speak. Nevertheless, I retain this seeming all the same.

⁴⁵ Moon, "Knowing Without Evidence," 321.

Moon's primary concern is not to deny that non-occurrent memories exist; rather, his contention is that subjects cannot *base* beliefs on such non-occurrent states.⁴⁶ For all that I have said here, and given the nature of the basing-relation, perhaps Moon is correct that the sleeping subject cannot at that time base his belief on his non-occurrent memories; but this is not something internalism, properly understood demands: epistemic internalism is a thesis about propositional, not doxastic justification. Moon's argument from cases of non-occurrent memory, therefore, is no threat to internalism, properly understood.

4.2. Internalists' Responses If Memory Beliefs Are Regarded As Epistemically *Non-Basic*

So far I have been considering epistemically internalist responses to the justification of memory beliefs from within a framework which holds that memory beliefs can be properly basic, which is to say that they can be foundationally justified. Roughly speaking, foundationalist epistemologies hold that some of our beliefs are justified, but not in virtue of being justified by other beliefs we hold. That is not to say necessarily that such foundational beliefs are *groundless*, but just that their justifying grounds are something other than other beliefs.⁴⁷ The main alternative kinds of grounds examined have been broadly *experiential*, rather than *doxastic*. Looking again at responding to the challenge of the justification of memory beliefs from within an epistemically internalist perspective, I have been exploring two possible kinds of foundationalist grounds. Recall that Williamson asserted:

Many of our factual memories come without any particular phenomenology of *memory images* or *feelings of familiarity*. We cannot remember how we acquired the information, and it may be relatively isolated, but we still use it when the need arises.⁴⁸ (emphasis added)

Two possibilities that one might possibly conflate in the above passage, as we have seen, are first that memory beliefs are foundationally justified by what Williamson calls "memory images," or what I have been calling "episodic memory." In so-called cases of "forgotten evidence," on the other hand, I have been arguing that what foundationally justifies factual memory beliefs are phenomenologically distinct states of memory-seemings that are characterized in terms of, among other things, a feeling of familiarity and pastness for example, as

⁴⁶ Moon, "Knowing Without Evidence," 322.

⁴⁷ cf. Pryor, "There is Immediate Justification."

⁴⁸ Williamson, "On Being Justified in One's Head," 110-11.

well as their content. Such phenomenology seems to be constitutively involved in experiential states of what we would describe as *seeming to remember*, states whose content is the proposition seemingly remembered.

But what if one rejects epistemic foundationalism in general, either because one endorses a version of coherentism⁴⁹ or infinitism,⁵⁰ or else while one accepts foundationalism for some class of beliefs, one denies that memory beliefs are epistemically basic? In that case, is there any non-foundationalist account of the epistemology of memory that can accommodate epistemic internalism? Or would the rejection of foundationalism in general, or about memory in particular, thereby entail a rejection of epistemic internalism about memory?

I myself am inclined to accept some version of moderate foundationalism. Such a foundationalism would be “moderate” as opposed to “classical,” since it does not require that basic beliefs be infallibly justified, incorrigible, or necessarily evident to the senses, etc. Also, non-basic beliefs need not be *logically entailed* by basic beliefs in order to be justified, for example. Still, it is worth examining what strategies might be open to non-foundationalists who are otherwise tempted by epistemic internalism, but are worried about the issue of the justification of memory beliefs.

Memory Beliefs as Non-Basically Justified: The Positive Proposal

How then might memory beliefs, regarded as epistemically non-basic, be justified in a way consistent with epistemic internalism? Supposing that one must have an internally accessible reason to think that a particular memory belief is likely to be true if it is to be justified, what form might such a reason take?

Take a paradigm case of forgotten evidence, such as one’s firm belief that, for example, the Battle of Hastings was fought in 1066. One is confident that this belief is justified, but suppose that one cannot call to mind how or when one learned this. Also, contrary to what I suggested earlier, suppose that memory-seemings play no justifying role. Still, the following supporting considerations are available to one, upon reflection:⁵¹

⁴⁹ E.g. Bonjour, *The Structure of Empirical Knowledge*; Keith Lehrer, *Theory of Knowledge*, 2nd ed. (Boulder, Co: Westview Press, 2000).

⁵⁰ E.g. Peter Klein, “Foundationalism and the Infinite Regress of Reasons,” *Philosophy and Phenomenological Research* 58 (1998): 919-925.

⁵¹ One might object that this cannot account for the justification of beliefs among the cognitively unsophisticated, such animals or very small children. Perhaps, or perhaps not. I take it as an open question, not necessarily as a datum to be explained, whether animals and small children have justification for their beliefs (granting that they may enjoy other positive epistemic statuses, such as knowledge). Either way, the charge of over-intellectualization is a

Epistemic Internalism, Justification, and Memory

1. One can seem to recall in the past having produced many correct answers to questions about English history trivia;
2. Therefore, one is usually correct about English history trivia;
3. One is now considering a proposition concerning English history trivia;
4. One believes that the Battle of Hastings was fought in 1066;
5. Therefore, one's belief that the Battle of Hastings was fought in 1066 is likely true.

Here we can see that both conditions an epistemic internalist places on justification can be satisfied. First, recall the awareness condition:

AWARENESS: S is justified in believing that *p* only if

- i. there is something, X, that contributes to the justification of belief B;
and
- ii. for all X that contributes, S is aware (or potentially aware) *that X contributes to the justification of belief B.*

Here there is something that contributes to the justification of the subject's belief about when the Battle of Hastings was fought that the subject is *potentially* aware of, namely the simple inductive argument presented above.⁵²

worry for internalism in general, and so is no special difficulty for the question of the justification of memory beliefs in particular, which is the focus of this paper.

⁵² The account I offer here is similar in spirit to an account Christopher Peacocke gives of what he calls "knowledge which is not based on reasons," where reasons include other beliefs, testimony, as well as sensory experience (Christopher Peacocke, *Thoughts: An Essay on Content* (Oxford: Blackwell, 1986) – see the final chapter on "Rationality Requirements, Knowledge, and Content", 160-7). What Peacocke calls the Model of Virtual Inference holds that "a belief held without reasons is knowledge only if a sound, and in the circumstances knowledge yielding, inference to the best explanation *could* be made from the evidence available to the believer to the truth of his belief." (Peacocke, *Thoughts*, 163-4) Here Peacocke's focus is on knowledge, rather than my focus, which is on justification. Also, he specifically, and perhaps quite demandingly, requires a knowledge-yielding inference to the best explanation. My account is more general, in that I allow that it be enough that an inference to the best explanation be *justified* or *reasonable*, rather than knowledge yielding. Even more generally, while an inference to the best explanation might be sufficient to confer *prima facie* justification, I allow that other accessible rational relations might obtain between grounds and belief, such as simple inductive considerations, like in my example above. Still, what is similar between our accounts, is that both Peacocke and I are proposing a kind of rationality requirement that does not require the subject to have actually made the relevant inferences – it is enough that these considerations are *available* to the subject, given their evidence. As Peacocke writes, "The model is one of virtual, rather than real inference, since it denies that the thinker who has knowledge ratified by its claims is really himself making these inferences." (Peacocke, *Thoughts*, 164)

B.J.C. Madison

In addition, the internalist's second principle can be satisfied too. DEMON states that:

DEMON: factors external to the subject's awareness, such as the reliability of the mechanism that gave rise to the belief, are not necessary for the belief to be justified.

So whether the subject is the victim of an evil demon or not, for example, he would have justification to hold his memory belief, so long as he had access to the simple inductive argument above, which he would, supposing that an envatted twin and his normal world counterpart share subjectively indistinguishable first person perspectives.

Memory Beliefs as Non-Basically Justified: An Objection

Does this approach to the justification of memory beliefs not lead straightforwardly to an untoward form of scepticism? In criticizing what he calls the "Inferential Theory" of memory justification, Michael Huemer writes,

[...] I would have to be in some sense using the argument *every time* I had a justified memory belief. It would not be enough for me to go through the argument once, and thenceforth merely remember that I had demonstrated the reliability of memory. [...] Given that my belief that the sun is 93 million miles from the earth [for example] is continuously present (it remains as a dispositional belief even when I'm not thinking about it), I will apparently need to be employing the argument for the reliability of memory continuously, if I am to keep my justification. The defender of the inferential account may claim that I am using this argument (whatever it is) for the reliability of memory only unconsciously, but it remains implausible that I am using it all the time, even unconsciously. Indeed, there is no evidence that I have ever employed any such argument at all, so scepticism seems to be the price of the inferential account.⁵³

If internalists were committed to holding that a subject must have actually occurrently performed such justificatory reasoning, or is somehow performing such reasoning "all the time," in some unconscious way, as a necessary condition of holding a justified memory belief, then Huemer is right to conclude that such a view is psychologically implausible and accordingly leads to scepticism. It could then be rejected on this basis.

Thankfully, internalists need not be committed to any such thing. This is because as I said above, internalists ought to think of their view as a thesis about *propositional* rather than *doxastic* justification in the first instance. With the

⁵³ Huemer, "The Problem of Memory Knowledge," 347-348.

distinction between propositional and doxastic justification now drawn, the internalist can consistently maintain that a subject's memory belief is justified without having to appeal to unconscious use of arguments or having to insist that for every justified belief, a justifying inference must actually have been performed at some point in the past. This is because the subject may enjoy *propositional* justification for his memory beliefs, as well as for their supporting grounds (and also in many cases doxastic justification, if the basing relation obtains).

In my earlier example of believing that the Battle of Hastings was fought in 1066, the subject might have justification to believe this, as well as for the premises for the supporting inductive argument I offered above, regardless of whether he actually does believe these propositions. Remembering that the awareness condition specifies actual or *potential* awareness of justification contributors, it seems the subject *would* or *could* access his justifying grounds, in this case, simple inductive grounds, upon reflection. So while there may not be doxastic justification in *some* cases of forgotten evidence, there can remain propositional justification, which is enough to account for our pre-theoretical intuition that there can be justification in such cases. For these reasons the 'must-use-argument-every-time' objection is off-point, and accordingly, fails.

5. Conclusion

I have argued that if memory belief can be foundationally justified, it can be justified by one's retained episodic memory. However, in cases of "forgotten evidence," no such grounds are available. In such cases I have argued that memory beliefs can still be justified foundationally on the basis of the phenomenally distinctive experiential states I described as "memory-seemings:" one's seeming to remember that P is *prima facie* justification for one's memory belief that P. The grounds of apparent memories *feel* like memories – they have a distinctive feel of familiarity and having been acquired in the past, and they present their content as true. It is in virtue of these grounds that such memory beliefs enjoy *prima facie* justification.

If on the other hand memory beliefs are not properly basic, I have outlined a strategy that aims to show that for all clear cases of justified memory belief, we have easy access to simple inductive considerations that count in favour of the truth of the apparent memory belief, thereby justifying it.

Epistemic internalism has not been thoroughly motivated and developed here, but enough has been said to bring out some of its essential commitments, namely an insistence on the necessity of an awareness requirement on justification, as well as holding that factors external to such awareness play no

B.J.C. Madison

justifying role. Many have thought it obvious that no such view can be correct, as it has been alleged that internalism cannot account for the possibility of memory justification. I hope to have shown that this conclusion is far from obvious. Rather, I believe that I have shown that, despite other difficult challenges that epistemic internalism might face, memory belief poses no special problems that the resources of internalism cannot adequately address.⁵⁴

⁵⁴ Thanks to audiences in Warwick, Belfast, Lund, and Cambridge. Thanks to Vickie Madison, Rhiannon James, and especially Chris Tucker for helpful written comments on earlier drafts of this paper.