

# WHY GETTIER CASES ARE MISLEADING

Moti MIZRAHI

ABSTRACT: In this paper, I argue that, as far as Gettier cases are concerned, appearances are deceiving. That is, Gettier cases merely appear to be cases of epistemic failure (i.e., failing to know that  $p$ ) but are in fact cases of semantic failure (i.e., failing to refer to  $x$ ). Gettier cases are cases of reference failure because the candidates for knowledge in these cases contain ambiguous designators. If this is correct, then we may simply be mistaking semantic facts for epistemic facts when we consider Gettier cases. This, in turn, is a good reason not to assign much, if any, evidential weight to Gettier intuitions (i.e., that  $S$  doesn't know that  $p$  in a Gettier case).

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

## 1. Introduction

It is often said that “the JTB analysis was refuted by Edmund Gettier.”<sup>1</sup> In his seminal paper “Is Justified True Belief Knowledge?” Gettier presents counterexamples to the Justified True Belief (JTB) analysis of knowledge, according to which  $S$  knows that  $p$  if and only if  $p$  is true,  $S$  believes that  $p$ , and  $S$  is justified in believing that  $p$ .<sup>2</sup> Gettier's argument against JTB can be summed up as follows:

- G1. If knowledge is JTB, then  $S$  knows that  $p$  in a Gettier case.
- G2.  $S$  doesn't know that  $p$  in a Gettier case.

Therefore,

- G3. It is not the case that knowledge is JTB.

Premise G2 is based on what appears to be the case in Gettier cases. That is, in a Gettier case, it seems (at least to some) that  $S$  doesn't know that  $p$ . Then, the content of this intellectual appearance, namely,  $\langle S$  doesn't know that  $p$  in a Gettier case  $\rangle$ , is used as a premise in an argument, like the aforementioned *modus*

---

<sup>1</sup> Timothy Williamson, “Knowledge First Epistemology,” in *The Routledge Companion to Epistemology*, eds. Sven Bernecker and Duncan Pritchard (New York: Routledge, 2011), 209.

<sup>2</sup> Edmund L. Gettier, “Is Justified True Belief Knowledge?” *Analysis* 23 (1963): 121-123.

*tollens* argument from premises G1 and G2 to conclusion G3, which is taken by many epistemologists to amount to a refutation of JTB.

According to Weatherson, however, “maybe respecting the Gettier intuitions was the wrong reaction, we should instead have been explaining why we are all so easily misled by these kinds of cases.”<sup>3</sup> This is what I aim to do in this paper. That is, in what follows, I will try to explain why Gettier cases are misleading. I will argue that, contrary to appearances, Gettier cases are actually cases of semantic, not epistemic, failure. This is because Gettier cases involve what Kripke calls “ambiguous designators.” If this is correct, then we should not respect Gettier intuitions. That is, there is a good reason not to assign much, if any, evidential weight to Gettier intuitions.<sup>4</sup> To be clear, I will not be defending the JTB analysis of knowledge against Gettier and Gettier-style cases. Nor will I be offering a “solution” to the so-called Gettier problem. Rather, I will show why Gettier and Gettier-style cases are misleading. Since I think that Gettier cases are misleading, I don’t think we are in a position to say whether the subjects in Gettier cases have knowledge or not, whether the beliefs are true or not, whether the beliefs are justified or not, and so on.

In what follows, then, I will explain “why we are all so easily misled by these kinds of cases [namely, Gettier and Gettier-style cases].”<sup>5</sup> I will proceed by considering five Gettier and Gettier-style cases. The first two are Gettier’s original cases, namely, Case I and Case II. The third is the sheep-in-the-meadow case (due to Chisholm). The fourth is the Fake Barn case (due to Ginet). The fifth is the Stopped Clock case (due to Russell). Unlike Gettier’s original cases, the other Gettier-style cases are supposed to be cases in which the candidate for knowledge is not inferred from any falsehoods.<sup>6</sup> I will argue that all these cases are misleading

---

<sup>3</sup> Brian Weatherson, “What Good Are Counterexamples?” *Philosophical Studies* 115 (2003): 1-31.

<sup>4</sup> Another challenge to the alleged evidential status of Gettier intuitions comes from experimental philosophy. On this debate, see the following: Jennifer Nagel, “Intuitions and Experiments: A Defense of the Case Method in Epistemology,” *Philosophy and Phenomenological Research* 85 (2012): 495-527. Stephen Stich, “Do Different Groups Have Different Epistemic Intuitions? A Reply to Jennifer Nagel,” *Philosophy and Phenomenological Research* 87 (2013): 151-178. Jennifer Nagel, “Defending the evidential value of epistemic intuitions: a reply to Stich,” *Philosophy and Phenomenological Research* 87 (2013): 179-199. The main argument of this paper does not depend on experimental results concerning Gettier intuitions.

<sup>5</sup> Weatherson, “What Good,” 1.

<sup>6</sup> For the “no false lemmas” response to Gettier cases, see David M. Armstrong, *Belief, Truth, and Knowledge* (New York: Cambridge University Press, 1973), 152 and Michael Clark, “Knowledge and Grounds: A Comment on Mr. Gettier’s paper,” *Analysis* 24 (1963): 46-48. See also Robert K.

insofar as they merely appear to be cases of epistemic failure (i.e., failing to know that  $p$ ), when in fact they are cases of semantic failure (i.e., failing to refer to  $x$ ). Gettier cases are cases of reference failure because the candidates for knowledge in these cases contain ambiguous designators. If this is correct, then we may simply be mistaking semantic facts for epistemic facts when we consider Gettier cases. This, in turn, is a good reason not to assign much, if any, evidential weight to Gettier intuitions (i.e., that  $S$  doesn't know that  $p$  in a Gettier case).

## 2. Gettier's Original Cases

In Gettier's first case, the candidate for knowledge, which Smith infers from "Jones is the man who will get the job, and Jones has ten coins in his pocket,"<sup>7</sup> is the following proposition:

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

Since Smith gets the job and has ten coins in his pocket, (I) is true. Smith believes (I) and is justified in believing (I), insofar as he has some evidence for (I), so all the conditions of the JTB analysis of knowledge are supposedly met. But Smith does not know that (I) is true, or so it seems to many philosophers and non-philosophers.<sup>8</sup>

This case is misleading, however, because it merely appears to be a case of epistemic failure (i.e., failing to know that  $p$ ) but is in fact a case of semantic failure (i.e., failing to refer to  $x$ ). To see why, notice that, when Smith believes that the man who will get the job has ten coins in his pocket,<sup>9</sup> the "coins" that Smith wishes to talk about are *not* the coins that are actually in his pocket. In other words, 'coins' in Gettier's Case I is what Kripke calls an "ambiguous designator."<sup>10</sup>

---

Shope, *The Analysis of Knowing: A Decade of Research* (Princeton, NJ: Princeton University Press, 1983), 24 and the Appendix in John L. Pollock, *Contemporary Theories of Knowledge* (Totowa: Rowman and Littlefield, 1986). Cf. Michael Levin, "Gettier Cases Without False Lemmas," *Erkenntnis* 64 (2006): 381-392.

<sup>7</sup> Gettier, "Is Justified True Belief," 122.

<sup>8</sup> For a recent study on Gettier intuitions among non-philosophers, see Edouard Machery, et al, "Gettier across cultures," *Noûs*. DOI: 10.1111/nous.12110.

<sup>9</sup> Gettier, "Is Justified True Belief," 122.

<sup>10</sup> Saul Kripke, "Speaker's Reference and Semantic Reference," *Midwest Studies in Philosophy* 2 (1977): 255-276.

Along the lines of Grice's distinction between what a speaker's words mean and what the speaker means in saying these words,<sup>11</sup> Kripke draws a distinction between speaker's reference and semantic reference. To illustrate the distinction, Kripke gives the following example:

Two people see Smith in the distance and mistake him for Jones. They have a brief colloquy: "What is Jones doing?" "Raking the leaves." "Jones," in the common language of both, is a name of Jones; it *never* names Smith. Yet, in some sense, on this occasion, clearly both participants in the dialogue have referred to Smith, and the second participant has said something true about the man he referred to if and only if Smith was raking the leaves (whether or not Jones was).<sup>12</sup>

According to Kripke, then, "the speaker's referent of a designator [is] that object which the speaker wishes to talk about, on a given occasion, and believes fulfills the conditions for being the semantic referent of the designator."<sup>13</sup> In Kripke's example, the speaker's referent of 'Jones' is Smith, whereas the semantic referent of 'Jones' is Jones. In Gettier's Case I, the speaker's referent of 'coins' is the ten coins that are in Jones' pocket, whereas the semantic referent of 'coins' is the ten coins that are in Smith's pocket. For this reason, 'coins' is an ambiguous designator in Gettier's Case I.<sup>14</sup>

If this is correct, then it is not clear that, by using 'coins', Smith manages to successfully refer to the ten coins that fulfill the conditions for being the semantic referent of 'coins', i.e., the ten coins that make (I) true. After all, Smith wishes to talk about the ten coins that are in Jones' pocket. But the ten coins that are in Jones' pocket do not fulfill the conditions for being the semantic referent of 'coins' in Case I, i.e., the referent of 'coins' that makes (I) true, since the "coins" that Smith wishes to talk about are *not* the coins that are in the pocket of the man who will get the job. If this is correct, then Gettier's Case I is a case of reference failure, which is a semantic failure, not an epistemic failure, and hence not knowledge failure.<sup>15</sup>

---

<sup>11</sup> H. P. Grice, "Utterer's Meaning and Intentions," *The Philosophical Review* 78 (1969): 147-177.

<sup>12</sup> Kripke, "Speaker's Reference," 263.

<sup>13</sup> Kripke, "Speaker's Reference," 264.

<sup>14</sup> In Gettier's Case I, 'the man' is an ambiguous designator as well. Cf. Christoph Schmidt-Petri, "Is Gettier's First Example Flawed?" *Knowledge and Belief*, eds. W. Löffler and P. Weingartner (ALWS, 2003), 317-319.

<sup>15</sup> Cf. Adrian Heathcote, "Truthmaking and the Gettier Problem," in *Aspects of Knowing: Epistemological Essays*, ed. Stephen Hetherington (Amsterdam: Elsevier, 2006), 151-168 on a different sort of semantic ambiguity in Case I. Unlike Heathcote, I am not trying to offer a

What makes Gettier's Case I misleading, then, is the presence of the ambiguous designator 'coins.' Given that 'coins' is an ambiguous designator, it is not clear that, by using 'coins,' Smith manages to successfully refer to what fulfills the conditions for being the semantic referent of 'coins,' which is different from what Smith wishes to talk about. This means that, upon considering Gettier's Case I, we may be confusing the fact that Smith fails to refer to what actually fulfills the conditions for being the semantic referent of 'coins,' which is a semantic fact about the case, with an epistemic fact, namely, that Smith doesn't know that (I) is the case.

In Gettier's second case, the candidate for knowledge, which Smith infers from "(g) Either Jones owns a Ford, or Brown is in Boston,"<sup>16</sup> is the following proposition:

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

Since the second disjunct of (h) happens to be true, (h) is true. Smith believes (h) and is justified in believing (h), insofar as he has some evidence for "(f) Jones owns a Ford," from which Smith gets (g) and then infers (h), so all the conditions of the JTB analysis of knowledge are supposedly met. But Smith does not know that (h) is true, or so it seems to many philosophers and non-philosophers.

It is important to note that, unlike Case I, Case II involves two inferences. The first inference is from

(f) Jones owns a Ford.

to

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

The second inference is from (g) to

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

Smith's evidence for (f) is that "Jones has at all times in the past within Smith's memory owned a car, and always a Ford, and that Jones has just offered Smith a ride while driving a Ford."<sup>17</sup> In using 'Jones,' then, Smith wishes to talk about the person who offered Smith a ride, has always owned a Ford, etc. But the person who offered Smith a ride, has always owned a Ford, etc. does not fulfill the

---

"solution" to the so-called Gettier problem, since I think the cases are misleading, as I try to show in this paper.

<sup>16</sup> Gettier, "Is justified true belief," 122.

<sup>17</sup> Gettier, "Is justified true belief," 122.

conditions for being the semantic referent of 'Jones' in Case II, i.e., the referent of 'Jones' that makes (g) true, since, by stipulation the person that Smith wishes to talk about by using 'Jones' does not own a Ford. In Gettier's Case II, then, the speaker's referent of 'Jones' is the person who offered Smith a ride, has always owned a Ford, etc., whereas the semantic referent of 'Jones,' i.e., the referent of 'Jones' that makes (g) true, cannot be that person, since Jones does not own a Ford, by stipulation. For this reason, 'Jones' is an ambiguous designator in Gettier's Case II. If this is correct, then, like Case I, Case II is a case of reference failure, which is a semantic failure, not an epistemic failure, and hence not knowledge failure.

What makes Gettier's second case misleading, then, is the presence of the ambiguous designator 'Jones.' Given that 'Jones' is an ambiguous designator, it is not clear that, by using 'Jones,' Smith manages to successfully refer to what fulfills the conditions for being the semantic referent of 'Jones,' which is different from what Smith wishes to talk about. This means that, upon considering Gettier's second case, we may be confusing the fact that Smith fails to refer to what actually fulfills the conditions for being the semantic referent of 'Jones,' which is a semantic fact about the case, with an epistemic fact, namely, that Smith doesn't know that (h) is the case.

### 3. The Sheep-in-the-Meadow Case

The sheep-in-the-meadow case<sup>18</sup> is supposed to be a Gettier-style case without false lemmas (i.e., without inferences from falsehoods):<sup>19</sup>

It's a bright sunny day; I'm out in the country; and it looks to me like there's a sheep in a certain meadow. [...] So I believe that there's a sheep in the meadow. And let's suppose that there *is* a sheep in the meadow, so that my belief is true. [...] So I have a justified true belief that there's a sheep in the meadow. Do I *know* that there's a sheep in the meadow?<sup>20</sup>

---

<sup>18</sup> Roderick Chisholm, *Theory of Knowledge* (Englewood Cliffs, NJ: Prentice Hall, 1966).

<sup>19</sup> An earlier so-called Gettier-style case without false lemmas can be found in Gilbert Harman, *Thought* (Princeton, NJ: Princeton University Press Harman, 1973), 75. Cf. William G. Lycan, "On the Gettier Problem Problem," in *Epistemology Futures*, ed. S. Hetherington (New York: Oxford University Press, 2006), 148-168. Lycan defends JTB with the addition of the "no false lemmas" condition. Another epistemologist who defends the tripartite analysis of knowledge is Stephen Hetherington, *Good Knowledge, Bad Knowledge: On Two Dogmas of Epistemology* (New York: Oxford University Press, 2001). Cf. Anthony R. Booth, "The Gettier Illusion, the Tripartite Analysis, and the Divorce Thesis," *Erkenntnis* 79 (2014): 625-638.

<sup>20</sup> Jay F. Rosenberg, *Three Conversations about Knowing* (Indianapolis: Hackett Publishing Co., 2000), 30.

Since there is a rock that looks like a sheep in the meadow, and there is an actual sheep behind the rock that looks like a sheep, it seems that the subject *S* in the sheep-in-the-meadow case does not know that there's a sheep in the meadow because *S*'s belief that there's a sheep in the meadow is accidentally true or true as a matter of epistemic luck.<sup>21</sup>

However, I think that the sheep-in-the-meadow case is misleading in much the same way that Gettier's original cases are misleading. Like 'coins' in Case I, and 'Jones' in Case II, 'sheep' is an ambiguous designator in the sheep-in-the-meadow case. In terms of semantic reference, 'sheep' designates the actual sheep that makes <there's a sheep in the meadow> true. In terms of speaker's reference, 'sheep' designates what *S* wishes to talk about, which is a rock that to *S* looks like a sheep, not the actual sheep that makes <there's a sheep in the meadow> true. If this is correct, then it is not clear that, by using 'sheep', *S* manages to successfully refer to the sheep that makes <there's a sheep in the meadow> true. After all, *S* wishes to talk about the "sheep" that *S* sees. But the "sheep" that *S* sees does not fulfill the conditions for being the semantic referent of 'sheep,' i.e., the referent of 'sheep' that makes <there's a sheep in the meadow> true, given that it is a rock that to *S* looks like a sheep. If this is correct, then the sheep-in-the-meadow case is a case of reference failure, which is a semantic failure, not an epistemic failure, and hence not knowledge failure.

What makes the sheep-in-the-meadow case misleading, then, is the presence of the ambiguous designator 'sheep'. Given that 'sheep' is an ambiguous designator, it is not clear that, by using 'sheep', *S* manages to successfully refer to what fulfills the conditions for being the semantic referent of 'sheep', which is different from what *S* wishes to talk about. This means that, upon considering the sheep-in-the-meadow case, we may be confusing the fact that *S* fails to refer to what actually fulfills the conditions for being the semantic referent of 'sheep', which is a semantic fact about the case, with an epistemic fact, namely, that *S* doesn't know that there's a sheep in the meadow.

#### 4. The Fake Barn Case

The same diagnosis, I submit, applies to other so-called Gettier-style cases without false lemmas. Consider Goldman's<sup>22</sup> Fake Barn case (due to Carl Ginet):<sup>23</sup>

---

<sup>21</sup> Duncan Pritchard, *Epistemic Luck* (New York: Oxford University Press, 2005), 145-177.

<sup>22</sup> Alvin I. Goldman, "Discrimination and Perceptual Knowledge," *The Journal of Philosophy* 73 (1976): 771-791.

<sup>23</sup> Cf. Jason Stanley, *Knowledge and Practical Interests* (New York: Oxford University Press, 2005), 114.

Henry is driving in the countryside and sees a barn ahead in clear view. On this basis he believes that the object he sees is a barn. Unknown to Henry, however, the area is dotted with barn facades that are indistinguishable from real barn from the road. However, Henry happens to be looking at the one real barn in the area.<sup>24</sup>

In the Fake Barn case, it seems that the JTB conditions are all met. Moreover, Henry's belief that there is a barn over there is not inferred from any falsehoods, and yet Henry does not know that there is a barn over there, or so it seems.

But the Fake Barn case is misleading as well. Like 'coins' in Case I, 'Jones' in Case II, and 'sheep' in the sheep-in-the-meadow case, 'barn' is an ambiguous designator in the Fake Barn case. In terms of semantic reference, 'barn' designates the one real barn in Barn County that makes <there's a barn over there> true. In terms of speaker's reference, 'barn' designates what *S* wishes to talk about. In that case, however, it is not clear that, by using 'barn', *S* manages to successfully refer to the one real barn that makes <there's a barn over there> true. After all, *S* could have easily referred to a mere barn-façade by using 'barn', since Barn County is peppered with barn-façades. In terms of speaker's reference, then, 'barn' refers to what to *S* looks like a barn, which could have easily been a barn façade, not the one real barn that makes <there's a barn over there> true.<sup>25</sup> If this is correct, then, like Gettier's Case I and the sheep-in-the-meadow case, the Fake Barn case is a case of reference failure, which is a semantic failure, not an epistemic failure, and hence not knowledge failure.

What makes the Fake Barn case misleading, then, is the presence of the ambiguous designator 'barn'. Given that 'barn' is an ambiguous designator, it is not clear that, by using 'barn', *S* manages to successfully refer to what fulfills the conditions for being the semantic referent of 'barn', which is different from what *S* wishes to talk about. This means that, upon considering the Fake Barn case, we may be confusing the fact that *S* fails to refer to what actually fulfills the conditions for being the semantic referent of 'barn', which is a semantic fact about the case, with an epistemic fact, namely, that *S* doesn't know that there's a barn over there.

---

<sup>24</sup> John Greco, *Achieving Knowledge: A Virtue-Theoretic Account of Epistemic Normativity* (New York: Cambridge University Press, 2010), 76.

<sup>25</sup> For more on accidentality in Gettier-style cases, see Masahiro Yamada, "Getting it Right by Accident," *Philosophy and Phenomenological Research* 83 (2011): 72-105 and Karl Schafer, "Knowledge and Two Forms of Non-Accidental Truth," *Philosophy and Phenomenological Research* 89 (2014): 373-393.



## 5. The Stopped Clock Case

Some might think that, in Russell's Stopped Clock case,<sup>26</sup> there are no ambiguous designators. In the Stopped Clock case the candidate for knowledge is, say, that the time is five o'clock. Since the clock stopped exactly twelve hours ago, and the time is in fact five o'clock, *S* doesn't know that the time is five o'clock, or so it might seem to many.<sup>27</sup>

Like the Gettier and Gettier-style cases discussed so far, however, I think that the Stopped Clock case also involves an ambiguous designator. To see why, note that, like 'sheep' in the sheep-in-the-meadow case, 'barn' in the Fake Barn case, 'coins' in Case I, and 'Jones' in Case II, 'the time' is an ambiguous designator in the Stopped Clock case. In terms of semantic reference, 'the time' designates the standard time in the time zone where it is currently five o'clock. In terms of speaker's reference, 'the time' designates what *S* wishes to talk about, which is a reading from the stopped clock. In that case, however, it is not clear that, by using 'the time', *S* manages to successfully refer to the standard time in the time zone where it is currently five o'clock, since *S* uses 'the time' to talk about something (namely, a reading from a stopped clock) that does not in fact fulfill the conditions for being the semantic referent of 'the time', given that the clock is not working properly.<sup>28</sup> After all, a clock is an instrument that indicates local time in a given time zone. Since the time indicator in the Stopped Clock case is a faulty one by stipulation, any given reading from this faulty time indicator does not fulfill the conditions for being the semantic referent of 'the time'.<sup>29</sup> If this is correct, then, like Gettier's Cases I and II, the sheep-in-the-meadow case, and the Fake Barn

---

<sup>26</sup> Bertrand Russell, *Human Knowledge: Its Scope and Its Limits* (London: George Allen & Unwin, 1948), 170-171.

<sup>27</sup> The Stopped Clock case rests on the assumption that a stopped clock shows the right time twice a day. For present purposes, I will not challenge this assumption although some do. See, e.g., Adrian Heathcote, "Truthmaking, Evidence of, and Impossibility Proofs," *Acta Analytica* 29 (2014): 363-375.

<sup>28</sup> Cf. Shope, *The Analysis of Knowing*, 20.

<sup>29</sup> Adrian Heathcote, "Gettier and the Stopped Clock," *Analysis* 72 (2012): 309-314 offers an explanation in terms of truthmakers for why *S* does not know that *p* (e.g., that the time is five o'clock) in Russell's Stopped Clock case. I remain noncommittal about whether *S* knows that *p* or not in the Stopped Clock case precisely because I think it is misleading. If I am right, then the Stopped Clock case is misleading in the same way that other Gettier and Gettier-style cases are misleading. That is, it merely appears to be a case of knowledge failure when in fact it is a case of reference failure. Since reference failure is a semantic, not an epistemic, failure, the Gettier intuition that *S* doesn't know that *p* in a Gettier case should not be respected.

case, the Stopped Clock case is a case of reference failure, which is a semantic failure, not an epistemic failure, and hence not knowledge failure.

What makes the Stopped Clock case misleading, then, is the presence of the ambiguous designator 'the time'. Given that 'the time' is an ambiguous designator, it is not clear that, by using 'the time', *S* manages to successfully refer to what fulfills the conditions for being the semantic referent of 'the time', which is different from what *S* wishes to talk about. This means that, upon considering the Stopped Clock case, we may be confusing the fact that *S* fails to refer to what actually fulfills the conditions for being the semantic referent of 'the time', which is a semantic fact about the case, with an epistemic fact, namely, that *S* doesn't know that the time is five o'clock.

## 6. Semantic Failure vs. Epistemic Failure

I have argued that Gettier and Gettier-style (without false lemmas) cases merely appear to be cases of epistemic failure (i.e., failing to know that *p*) but are in fact cases of semantic failure (i.e., failing to refer to *x*). This is because Gettier cases involve what Kripke calls "ambiguous designators." But failing to refer is a semantic failure, not an epistemic failure, like failing to know that *p*.

To illustrate the difference between semantic failure (i.e., failing to refer to *x*) and epistemic failure (i.e., failing to know that *p*), suppose I believe that this table is made of matter. By 'matter', however, I do not mean atoms that are made of subatomic particles. Rather, I use 'matter' to talk about green cheese. And I believe that everything in the universe, including this table, is made of green cheese. In that case, when I believe that this table is made of matter, I actually believe that this table is made of green cheese, since I use 'matter' to refer to green cheese. If I were to use 'matter' to refer to what fulfills the conditions for being the semantic referent of 'matter', i.e., if I were to use 'matter' to refer to atoms, then perhaps I would know that this table is made of matter. But I use 'matter' to refer to green cheese, not atoms, and so my failure is semantic (i.e., failing to refer to what fulfills the conditions for being the semantic referent of 'matter'), not epistemic (i.e., failing to know that this table is made of matter).

Similarly, if Smith were to use 'coins' to refer to the ten coins that make (I) true, i.e., the ten coins in his pocket, then perhaps Smith would know that the man who will get the job has ten coins in his pocket. But Smith uses 'coins' to refer to the coins in Jones' pocket, not the coins in his pocket, and so his failure is semantic (i.e., a failure to refer to what fulfills the conditions for being the semantic referent of 'coins'), not epistemic (i.e., a failure to know that the man who will get the job has ten coins in his pocket).

If Smith were to use 'Jones' to refer to the person that make (g) true, i.e., the person who owns a Ford, then perhaps Smith would know that Jones owns a Ford or Brown is in Barcelona. But Smith uses 'Jones' to refer to the person who offered Smith a ride, has always owned a Ford, etc., who doesn't own a Ford (by stipulation), and so Smith's failure is semantic (i.e., a failure to refer to what fulfills the conditions for being the semantic referent of 'Jones'), not epistemic (i.e., a failure to know that Jones owns a Ford or Brown is in Barcelona).

If *S* were to use 'sheep' to refer to the actual sheep that makes <there's a sheep in the meadow> true, then perhaps *S* would know that there's a sheep in the meadow. But *S* uses 'sheep' to refer to something that does not fulfill the semantic conditions for being the semantic referent of 'sheep' (namely, a rock that looks like a sheep to *S*), and so *S*'s failure is semantic (i.e., a failure to refer to what fulfills the conditions for being the semantic referent of 'sheep'), not epistemic (i.e., a failure to know that there's a sheep in the meadow).

If *S* were to use 'barn' to refer to the one real barn that makes <there's a barn over there> true, then perhaps *S* would know that there's a barn over there. But *S* uses 'barn' to refer to something that could have easily failed to fulfill the semantic conditions for being the semantic referent of 'barn' (namely, a mere barn-façade, given that Barn County is peppered with barn-façades), and so, if *S* fails, *S*'s failure is semantic (i.e., a failure to refer to what fulfills the conditions for being the semantic referent of 'barn'), not epistemic (i.e., a failure to know that there's a barn over there).

Finally, if *S* were to use 'the time' to refer the standard time in the time zone where it is currently five o'clock, then perhaps *S* would know that the time is five o'clock. But *S* uses 'the time' to refer to something that does not fulfill the semantic conditions for being the semantic referent of 'the time' (namely, a reading from a broken time indicator), and so *S*'s failure is semantic (i.e., a failure to refer to what fulfills the conditions for being the semantic referent of 'the time'), not epistemic (i.e., a failure to know that the time is five o'clock).

If this is correct, then Gettier cases are misleading because they merely appear to be cases of epistemic failure (i.e., failing to know that *p*), when in fact they are cases of semantic failure (i.e., failing to refer). Gettier cases are cases of reference failure because the candidates for knowledge in these cases contain ambiguous designators. If this is correct, then we may simply be mistaking semantic facts for epistemic facts when we consider Gettier cases. This, in turn, is a good reason not to assign much, if any, evidential weight to Gettier intuitions (i.e., that *S* doesn't know that *p* in a Gettier case). That is, there is a good reason to think that Gettier cases are misleading in a way that makes us mistake semantic

facts for epistemic facts. If this is correct, then we should not assign much, if any, evidential weight to Gettier intuitions.

## 7. Objections and Replies

I have argued that Gettier cases are misleading because the candidates for knowledge in these cases contain ambiguous designators. In this section, I will consider a couple of objections to my overall argument. The first objection goes like this. In evaluating Gettier cases, we are concerned with beliefs, not their verbal expressions, and so the notion of reference (either speaker's reference or semantic reference) does not apply to evaluating such cases.

In reply, I grant that it is not necessary that subjects make any claims or express their thoughts as far as the evaluation of Gettier cases is concerned. However, I think that the notion of reference is still relevant. After all, knowledge itself is supposed by many to either entail a mental state (such as belief) or be a mental state. According to Williamson, for instance, "knowing is the most general factive stative attitude" and the "characteristic expression of a factive stative attitude in language is a factive mental state operator (FMSO)."<sup>30</sup> For this reason, whether we think of subjects in Gettier cases as making claims or as having thoughts, which are supposed to express propositions, those propositions are supposed to be *about* something (e.g., coins, sheep, barns, etc.), which is why the notion of reference is relevant here.<sup>31</sup>

The second objection goes like this. Even if the candidates for knowledge in Gettier cases contain ambiguous designators, the epistemic facts about those cases are still clear. For example, in the sheep-in-the-meadow case, it is clear that *S* believes that there's a sheep in the meadow but doesn't know that there's a sheep in the meadow.

In reply, I would say that this is a little too quick and simple. For, if the candidates for knowledge in Gettier cases contain ambiguous designators, as I have argued, then that means that the relevant beliefs are ambiguous between two

---

<sup>30</sup> Timothy Williamson, *Knowledge and Its Limits* (New York: Oxford University Press, 2000), 34. See also Jessica Brown and Mikkel Gerken, "Knowledge Ascriptions: Their Semantics, Cognitive Bases, and Social Functions," in *Knowledge Ascriptions*, eds. Jessica Brown and Mikkel Gerken (New York: Oxford University Press, 2012), 1-30.

<sup>31</sup> Some readers may wish to invoke the Language of Thought Hypothesis (LOTH) here. According to LOTH, "thought and thinking are done in a mental language, i.e., in a symbolic system physically realized in the brain of the relevant organisms" (Murat Aydede, "The Language of Thought Hypothesis," in *The Stanford Encyclopedia of Philosophy*, ed. Edward N. Zalta (Fall 2015 Edition) URL = <http://plato.stanford.edu/archives/fall2015/entries/language-thought>). Of course, a symbol is supposed to stand for (or refer to) something.

interpretations: an “objective” interpretation in terms of the conditions that make the belief true (i.e., in terms of semantic reference or what a speaker’s words mean) and a “subjective” interpretation in terms of what *S* means (i.e., in terms of speaker’s reference or what a speaker means in uttering certain words). In the sheep-in-the-meadow case, for example, the belief that there’s a sheep in the meadow is ambiguous between these two interpretations:

*Objective interpretation* (semantic reference): the semantic referent of ‘sheep’ in <there’s a sheep in the meadow> is the actual sheep that makes <there’s a sheep in the meadow> true; otherwise, <there’s a sheep in the meadow> would not be true.

*Subjective interpretation* (speaker’s reference): the speaker’s referent of ‘sheep’ in <there’s a sheep in the meadow> is what *S* sees, which is the rock that looks like a sheep, not what *S* doesn’t see, which is the actual sheep that makes <there’s a sheep in the meadow> true.

As I have argued above, interpreted “objectively,” or in terms of what the words mean, <there’s a sheep in the meadow> is not what *S* actually believes, since *S* uses ‘sheep’ to talk about what *S* sees, not what *S* doesn’t see. Interpreted “subjectively,” or in terms of what *S* means by uttering these words, <there’s a sheep in the meadow> is strictly false, since *S* uses ‘sheep’ to talk about something that does not in fact fulfill the conditions for being the semantic referent of ‘sheep.’

We can see this ambiguity in Kripke’s case as well. It might seem as if the epistemic facts of Kripke’s case are clear: the two people believe that Jones is raking the leaves but they don’t know that Jones is raking the leaves. However, I submit that the epistemic facts of the case are not as clear as they might seem precisely because ‘Jones’ is an ambiguous designator in this case. The people who mistake Smith for Jones wish to talk about Jones, and so they use ‘Jones’. Their belief that Jones is raking the leaves is thus ambiguous between two interpretations:

1. *Semantic reference*: Jones (= Smith) is raking the leaves.
2. *Speaker’s reference*: Jones (= Jones) is raking the leaves.

By stipulation, (2) is false, since the people in the case mistake Smith for Jones and Jones is not in fact raking the leaves. On (2), then, the two people in Kripke’s case simply have a false belief. On the other hand, (1) is not actually what the people in the case believe, since they wish to talk about Jones and they use ‘Jones’ to talk about what they see, which is Smith raking the leaves. To put it

Moti Mizrahi

crudely, on (1), what goes on in their heads does not match the facts of the case. Given this ambiguity, then, the case, like Gettier cases in general, is misleading.

## 8. Conclusion

My aim in this paper has been to remove “some of the rubbish that lies in the way to knowledge.”<sup>32</sup> The “rubbish” I seek to remove is so-called Gettier intuitions elicited from Gettier cases. I have argued that Gettier cases are misleading insofar as they merely appear to be cases of epistemic failure (i.e., failing to know that  $p$ ) but are in fact cases of semantic failure (i.e., failing to refer to  $x$ ). Gettier cases are cases of reference failure because the candidates for knowledge in these cases contain ambiguous designators. If this is correct, then, because of this ambiguity, we may simply be mistaking semantic facts for epistemic facts when we consider Gettier cases. This, in turn, is a good reason not to assign much, if any, evidential weight to Gettier intuitions (i.e., that  $S$  doesn’t know that  $p$  in a Gettier case).

---

<sup>32</sup> John Locke, “Epistle to the Reader,” in *An Essay Concerning Human Understanding* (London, 1689).