

GETTIER CASES, MENTAL STATES, AND BEST EXPLANATIONS: ANOTHER REPLY TO ATKINS

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ABSTRACT: I have argued that Gettier cases are misleading because, even though they appear to be cases of knowledge failure, they are in fact cases of semantic failure. Atkins has responded to my original paper and I have replied to his response. He has then responded again to insist that he has the so-called “Gettier intuition.” But he now admits that intuitions are only defeasible, not conclusive, evidence for and/or against philosophical theories. I address the implications of Atkins’ admission in this paper and I again show that his attempts to revise Gettier’s original cases such that they do not involve semantic failures are unsuccessful.

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

1. Introduction

Philip Atkins has replied¹ to my reply² to his reply³ to my original paper.⁴ At bottom, Atkins’ latest reply consists in insisting that he has the so-called “Gettier intuition,” i.e., the seeming that *S* doesn’t know that *p* in a Gettier case. As he puts it:

Gettier cases standardly elicit the intuition that the relevant agent lacks knowledge even though the agent has a justified true belief. If this intuition is accurate, then Gettier cases are genuine counterexamples to the JTB analysis.⁵

And when he discusses his revised Gettier cases, Atkins again appeals to intuition when he writes, “It *seems* that Smith fails to know” (emphasis added), and

¹ Philip Atkins, “Getting Gettier Right: Reply to Mizrahi,” *Logos & Episteme* 3 (2017): 347-357.

² Moti Mizrahi, “Why Gettier Cases are Still Misleading: A Reply to Atkins,” *Logos & Episteme* 8 (2017): 129-139.

³ Philip Atkins, “Are Gettier Cases Misleading?” *Logos & Episteme* 7 (2016): 379-384.

⁴ Moti Mizrahi, “Why Gettier Cases are Misleading,” *Logos & Episteme* 7 (2016): 31-44.

⁵ Atkins, “Getting Gettier Right,” 347.

“*Intuitively*, Smith fails to know [that there is someone who is getting a job and handsome]” (emphasis added).⁶ That, by the way, counts as intuition mongering. That is to say, to insist that you have the intuition that p in the face of an interlocutor who clearly does not find p intuitive is to engage in mere intuition mongering.⁷ At any rate, as far as I can tell, Atkins’ argument against my diagnosis of Gettier cases as misleading has changed in a significant way. In this reply, then, I will address this argument. Before I do so, however, I will address what I take to be a few problems with his interpretation of the argument from Gettier cases against the Justified True Belief (JTB) analysis of knowledge and the so-called “Gettier intuition.”

2. Gettier Cases as Counterexamples

The argument from Gettier cases against the analysis of knowledge in terms of Justified True Belief (JTB) is usually stated as follows:

1. If knowledge is JTB, then S knows that p in a Gettier case.
2. It is not the case that S knows that p in a Gettier case.
3. Therefore, it is not the case that knowledge is JTB.⁸

This argument is often said to amount to a “refutation” of the JTB analysis of knowledge⁹ because it is an argument that employs the method of counterexample. The “method of counterexample is a *proof* procedure” (emphasis added),¹⁰ which “provides *conclusive* verdicts—proofs—of invalidity” (emphasis added).¹¹ For this reason, even though saying that Gettier “provided counterexamples to the JTB analysis [...] *seems* somewhat different from saying that Gettier provided a

⁶ Atkins, “Getting Gettier Right,” 352.

⁷ Moti Mizrahi, “On Appeals to Intuition: A Reply to Muñoz-Suárez,” *The Reasoner* 9 (2015): 12-13.

⁸ Mizrahi, “Why Gettier Cases are Misleading,” 31.

⁹ See, e.g., Timothy Williamson, “Knowledge First Epistemology,” in *The Routledge Companion to Epistemology*, eds. Sven Bernecker and Duncan Pritchard (New York: Taylor & Francis, 2011), 208-218.

¹⁰ Witold Marciszewski, “The Method of Counterexample,” in *Dictionary of Logic*, ed. Witold Marciszewski (Dordrecht: Springer, 1981), 70-73.

¹¹ Carlos A. Oller, “Teaching Sound Principles about Invalidity,” in *Tools for Teaching Logic*, eds. Patrick Blackburn, Hans Van Ditmarsch, Maria Manzano, and Fernando Soler-Toscano (Heidelberg: Springer, 2011), 178-182.

‘conclusive proof’” (emphasis added)¹² to Atkins, this is yet another case in which appearances are deceiving (in addition to Gettier cases). Contrary to Atkins’ seeming in this regard, arguments that employ the method of counterexample are supposed to be conclusive proofs. Of course, even if they are supposed to be conclusive refutations, such arguments can still fail to conclusively *refute* their target, especially when appeals to intuitions are involved.¹³

Accordingly, to say that Gettier cases are supposed to be counterexamples to the JTB analysis of knowledge is to say that Gettier cases are supposed to *refute* the JTB analysis of knowledge. In other words, they are supposed to demonstrate *conclusively* that the JTB analysis of knowledge is wrong. Now, if my argument is cogent,¹⁴ then Gettier cases can demonstrate no such thing. This is because Gettier cases are misleading, for they merely appear to be cases of knowledge failure, but in fact, they are cases of semantic failure.

3. Knowledge is a Mental State

Contrary to what Atkins tries to suggest in his recent reply, the semantic failure in Gettier cases is not something mysterious that occurs when terms “supposedly undergo a shift in reference.”¹⁵ What Atkins fails to take into consideration here is that knowledge (more precisely, knowing that *p*) is a mental state.¹⁶ Once we remind ourselves that, as far as the analysis of knowledge is concerned, knowledge (i.e., knowing that *p*) and belief (i.e., believing that *p*) are mental states, it becomes clear how the same term can be used by a subject to refer to different things. For example, I can use ‘Trump’ to talk about Donald Trump now and then use ‘Trump’ to talk about Donald Trump Jr. I can also use different terms to refer to the same individual. For example, I can use ‘Trump’ to talk about Donald Trump, but I can also use ‘Mogul’ to talk about Donald Trump, as Secret Service agents do. *Pace* Atkins,¹⁷ there is nothing metaphysically mysterious about this as long as we *keep in mind* that we are talking about *what goes on in a subject’s mind*, which is what

¹² Atkins, “Getting Gettier Right,” 349.

¹³ Moti Mizrahi, “Don’t Believe the Hype: Why Should Philosophical Theories Yield to Intuitions?” *Teorema: International Journal of Philosophy* 34 (2015): 141-158.

¹⁴ Mizrahi, “Why Gettier Cases are Misleading,” 31-44.

¹⁵ Atkins, “Getting Gettier Right,” 356.

¹⁶ Jennifer Nagel, “Knowledge as a Mental State,” *Oxford Studies in Epistemology* 4 (2013): 275-310.

¹⁷ Atkins, “Getting Gettier Right,” 356.

we should be talking about as far as Gettier cases are concerned, given that knowledge and belief are mental states.

Accordingly, if I come to believe that Mogul has left Mar-a-Lago, on the basis of a headline in my newsfeed that reads “Mogul has left Mar-a-Lago,” and I use ‘Mogul’ to talk about the real estate mogul Richard LeFrak, and so ‘Mogul’ designates Richard LeFrak *in my mind*, but it turns out that he has not left Mar-a-Lago, whereas Donald Trump has left Mar-a-Lago, then ‘Mogul’ in <Mogul has left Mar-a-Lago> is referentially ambiguous between Richard LeFrak and Donald Trump in this context. Now, since I use ‘Mogul’ to talk about Richard LeFrak, not Donald Trump, I have failed to refer to the mogul that actually makes <Mogul has left Mar-a-Lago> true, since the mogul that actually makes the content of my belief true is Donald Trump, not Richard LeFrak. Given that knowledge and belief are mental states, *in my mind*, ‘Mogul’ refers to Richard LeFrak, not Donald Trump, since I use ‘Mogul’ to talk about Richard LeFrak, not Donald Trump. Subjectively, then, my belief that Mogul has left Mar-a-Lago is about Richard LeFrak. In other words, the speaker’s reference of ‘Mogul’ is Richard LeFrak when I *believe* (mental state) that Mogul has left Mar-a-Lago. Objectively, however, the semantic reference of ‘Mogul’ is Donald Trump because Donald Trump is the mogul that actually makes <Mogul has left Mar-a-Lago> true, given that it is Donald Trump that has left Mar-a-Lago, not Richard LeFrak.

If I am right about this, then anyone who might have the intuition that I do not know that Mogul has left Mar-a-Lago, even if the content <Mogul has left Mar-a-Lago> might be considered *objectively* (i.e., with the semantic referent of ‘Mogul’ being Donald Trump) true and justified, has this intuition not because knowledge is not JTB, but because the case is misleading. When I believe that Mogul has left Mar-a-Lago, *in my mind*, ‘Mogul’ refers to Richard LeFrak, not Donald Trump, because I use ‘Mogul’ to talk about the former, not the latter. This, however, is a semantic failure, i.e., failure to refer to the semantic referent of ‘Mogul’, which is the mogul that actually makes <Mogul has left Mar-a-Lago> true (namely, Donald Trump, in this case), not an epistemic failure, i.e., failure to know that Mogul has left Mar-a-Lago. In other words, what I *believe* (in terms of speaker’s reference) does not match the facts, whereas what is *objectively* true (in terms of semantic reference) is *not* what I believe. The terms ‘the man’ and ‘coins’ in Gettier’s Case I,¹⁸ ‘Jones’ in Gettier’s Case II,¹⁹ ‘sheep’ in the sheep in the

¹⁸ Mizrahi, “Why Gettier Cases are Misleading,” 34.

¹⁹ Mizrahi, “Why Gettier Cases are Misleading,” 35-36.

meadow case,²⁰ ‘barn’ in the fake barn case,²¹ ‘the time’ in the stopped clock case,²² and ‘someone’²³ and ‘handsome’²⁴ in Atkins’ revision of Gettier’s Case I are all referentially ambiguous in much the same way that ‘Mogul’ is referentially ambiguous here.

In his latest reply, Atkins insists that ‘handsome’ is not referentially ambiguous. He simply asserts without argument that “it is unreasonable to insist that there is a divergence between the speaker’s referent of ‘handsome’ and the semantic referent of ‘handsome’.”²⁵ It is not clear to me why Atkins finds it so unreasonable to say that ‘handsome’ is referentially ambiguous. Unless Atkins thinks that there is some universal HANDSOMENESS that all attractive men (including Jones) participate in or instantiate, and that whenever we use ‘handsome’ we refer to that universal HANDSOMENESS, it is quite reasonable to say that Jones’ physical features (e.g., blue eyes, dark hair, athletic build, etc.) make him handsome, whereas another man’s physical features make that man handsome. In that case, when Smith comes to believe that Jones is handsome, he has Jones’ physical features *in mind*, for the evidence available to him is about Jones’ physical attributes (i.e., he looks at Jones and comes to believe that Jones is handsome), not some other man (or even himself, since Atkins stipulates that Smith doesn’t know he is also handsome).²⁶ On the other hand, the physical features that actually make <There is someone who is getting a job and handsome> true are Smith’s, by existential instantiation, not Jones’, just as the mogul that actually makes <Mogul has left Mar-a-Lago> true is Donald Trump, not Richard LeFrak.²⁷

With respect to Gettier’s second case, Atkins also insists that “Smith has both past Jones and present Jones in mind, and that his evidence is about both past Jones and present Jones, seeing as how past Jones and present Jones *are the same person*” (emphasis in original).²⁸ Atkins seems to think that what is true about a

²⁰ Mizrahi, “Why Gettier Cases are Misleading,” 37.

²¹ Mizrahi, “Why Gettier Cases are Misleading,” 38.

²² Mizrahi, “Why Gettier Cases are Misleading,” 39-40.

²³ Mizrahi, “Why Gettier Cases are Still Misleading,” 134-138.

²⁴ Mizrahi, “Why Gettier Cases are Still Misleading,” 135.

²⁵ Atkins, “Getting Gettier Right,” 352.

²⁶ Atkins, “Are Gettier Cases Misleading?” 381.

²⁷ In “Are Gettier Cases Misleading?” Atkins admits that “there is some sense in which Smith has Jones in mind when inferring [There is someone who is both getting a job and handsome] (383). For some unknown reason, however, he dismisses that as irrelevant.

²⁸ Atkins, “Getting Gettier Right,” 356.

person at a particular point in time must be true about that person at all times. To see how absurd that would be, consider the following. Eric stole a candy bar from a convenience store when he was 8 years old. From this, it follows that Eric is a thief. Now fast-forward 30 years and Eric is now 38 years old. By Atkins' lights, it is still true that Eric is a thief. Suppose that Eric is from Florida where petty theft is a second-degree misdemeanor. This means that Eric could face up to two years in prison. On Atkins' assumption that what is true of your past self must be true of your present self as well, then, we would have to conclude that Eric should face a two-year prison sentence for stealing a candy bar when he was 8 years old.

Of course, truths about people are *not* eternal and what is true about your past self may no longer be true now (or will no longer be true about your future self). As I put it in my previous reply to Atkins:

this sort of thing happens all the time; something could be true about a person at one point in time and then stop being true at a later point in time. The proposition 'George W. Bush is the President of the United States' was true from 2001 until 2009, but it was not true before 2001 and it is not true at present. The proposition 'Barack Obama is the President of the United States' is true now, but it will no longer be true after January 20, 2017.²⁹

The same thing happens in Gettier's Case II. When Smith comes to believe that Jones owns a Ford, he has *past* Jones in mind because his evidence consists of what he *remembers* about (past) Jones. That is, Smith wishes to talk about the person who "has at *all times in the past* within *Smith's memory* owned a Ford" (emphasis added).³⁰ As I have pointed out in my reply to Atkins, Gettier's use of temporal phrases, such as 'at all times in the past' and 'at present', is not accidental here.³¹ Since that time in the past, Jones ceased being a Ford owner, and so what was true about Jones *in the past* is no longer true about Jones *at the present*. Indeed, it looks like Atkins admits that when he writes:

Perhaps it is the case that 'Jones' initially designates *past* Jones and then comes to designate *present* Jones. This is perhaps why Mizrahi writes in his conclusion that "Smith has *past* Jones in mind, for Smith's evidence is about *past* Jones, not about *present* Jones."³²

²⁹ Mizrahi, "Why Gettier Cases are Still Misleading," 136.

³⁰ Edmund L. Gettier, "Is Justified True Belief Knowledge?" *Analysis* 23 (1963): 121-123.

³¹ Mizrahi, "Why Gettier Cases are Still Misleading," 136.

³² Atkins, "Getting Gettier Right," 356.

In that case, Atkins is simply being uncharitable here when he attempts to make this simple point about how a subject uses a term to refer to the same person at different times appear metaphysically mysterious. Be that as it may, there is nothing metaphysically mysterious about this and Atkins' talk about whether there is "one individual" or "two separate individuals" is a red herring.³³ If anyone is engaging in extravagant ontology here, it is Atkins. For, as mentioned above, his insistence that 'handsome' is not referentially ambiguous in the context of his revision of Gettier's Case II makes sense only if it is assumed that there is some universal HANDSOMENESS that all handsome men participate in or instantiate.

For these reasons, I have described the semantic failure (i.e., failing to refer to x) in Gettier cases in terms of what goes on in the subject's head or mind. For example:

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 [referentially] 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 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 (emphasis added).³⁴

If this is correct, then subjects' beliefs in Gettier cases are ambiguous between the following two interpretations:

Objective interpretation (in terms of semantic reference): For example, the semantic referent of 'Jones' in <Jones is raking the leaves> is the person that

³³ Atkins, "Getting Gettier Right," 356.

³⁴ Mizrahi, "Why Gettier Cases are Misleading," 43-44.

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actually makes <Jones is raking the leaves> true; otherwise, <Jones is raking the leaves> would not be true.

Subjective interpretation (in terms of speaker's reference): For example, the speaker's referent of 'Jones' in <Jones is raking the leaves> is what the two people in Kripke's case *have in mind* when they *believe* that Jones is raking the leaves, which is Smith, not Jones himself, who is the person that actually makes <Jones is raking the leaves> true.³⁵

Whether Kripke intended his distinction between speaker's reference and semantic reference to have this consequence vis-a-vis Gettier cases is beside the point. The important point for present purposes is that, given that knowledge and belief are mental states, it is quite common for one to use a term to refer to something that does not in fact make one's belief about that thing true. Again, this is a semantic failure (i.e., failure to refer to x) rather than an epistemic failure (i.e., failure to know that p).

Contrary to what Atkins seems to think,³⁶ we cannot simply ignore the truth conditions of the candidates for knowledge in Gettier cases. After all, according to the JTB analysis of knowledge, one of the necessary conditions for knowledge is *truth*. In order to determine whether S knows that p in a Gettier case, then, we have to determine whether p is true or not. In other words, we have to determine what makes p true in a Gettier case. The problem with Gettier cases, however, is that the truth conditions of the candidates for knowledge lend themselves to two different interpretations: an objective interpretation in terms of the semantic referents of the key terms in the content of the relevant belief and a subjective interpretation in terms of the speaker's referents of the key terms in the content of the relevant belief. For this reason, Gettier cases are misleading, since that which lends itself to more than one interpretation is ambiguous, and this "means that we should not assign much, if any, evidential weight to the so-called 'Gettier intuition', i.e., the intuition that S doesn't know that p in a Gettier case."³⁷

4. What Best Explains the So-Called "Gettier Intuition"?

Speaking of the evidential weight of intuitions, what I find interesting about Atkins' latest reply is his acknowledgement that intuitions are not conclusive evidence for or against philosophical theories. As he puts it: "My own modest view

³⁵ Mizrahi, "Why Gettier Cases are Still Misleading," 133.

³⁶ Atkins, "Getting Gettier Right," 353.

³⁷ Mizrahi, "Why Gettier Cases are Still Misleading," 131.

is that one's intuitions count as *good* evidence for or against philosophical theories, but they are also *defeasible*, as all forms of evidence are defeasible" (emphasis added).³⁸ Given that the "method of counterexample is a *proof* procedure" (emphasis added),³⁹ which "provides *conclusive* verdicts—proofs—of invalidity" (emphasis added),⁴⁰ Atkins' admission that intuitions are defeasible, not conclusive, evidence amounts to abandoning the argument from Gettier cases against the JTB analysis of knowledge outlined in Section 2. For that argument is supposed to amount to a conclusive refutation by counterexamples of the JTB analysis of knowledge, i.e., a deductively valid argument against JTB, whereas arguments that are based on defeasible premises are not meant to be deductively valid arguments.⁴¹ And that argument's premises are based on intuitions, which Atkins now admits are defeasible, not conclusive, evidence. After all, the only reason to think that premise (2) is true is that it seems to some who consider Gettier cases that *S* doesn't know that *p* in such a case. As I have argued elsewhere,⁴² an argument that employs the method of counterexample but relies on appeals to intuition would amount to a conclusive refutation only if our intuitions in response to hypothetical cases about knowledge (such as Gettier cases) perfectly track truths about knowledge, justification, and the like. Since we have no reason to think that our intuitions about knowledge, justification, and the like, perfectly track truths about these concepts, Atkins is correct in saying that intuitions about hypothetical cases involving these concepts do not amount to conclusive evidence for or against philosophical theories about these concepts.

If by admitting that intuitions in response to Gettier cases are not conclusive evidence against JTB Atkins effectively abandons the argument from Gettier cases against JTB outlined in Section 2, then the question is what argument does he offer instead. In other words, I have argued that we should not assign much, if any, evidential weight to the so-called "Gettier intuition" because Gettier cases are misleading. Atkins claims that we should assign *some* evidential weight to the so-

³⁸ Atkins, "Getting Gettier Right," 349. Atkins provides no argument for this "modest view."

³⁹ Marciszewski, "The Method of Counterexample," 70.

⁴⁰ Oller, "Teaching Sound Principles about Invalidity," 181.

⁴¹ Robert Koons, "Defeasible Reasoning," in *The Stanford Encyclopedia of Philosophy*, ed. Edward N. Zalta (Winter 2017 Edition), <https://plato.stanford.edu/archives/win2017/entries/reasoning-defeasible/>.

⁴² Mizrahi, "Don't Believe the Hype," 141-158.

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called “Gettier intuition.” The question, then, is why we should. What is Atkins’ argument against my diagnosis of Gettier cases as misleading?

At the end of his reply, Atkins provides a clue as to how he would answer to this question. He writes:

It stands to reason that the considerations adduced by Mizrahi are not responsible for our intuitions about Gettier’s second case. A much *better account of our intuitions* would be that knowledge is not justified true belief (emphasis added).⁴³

As I understand it, Atkins is making an Inference to the Best Explanation (IBE) here. For him, the *explanandum* is the fact that some people report having the so-called “Gettier intuition” and the *explanans* is that knowledge is not JTB, which means that the content of the so-called “Gettier intuition,” i.e., $\langle S \text{ doesn't know that } p \text{ in a Gettier case} \rangle$, is actually true. If this is correct, then this inference to the best explanation would run as follows:

1. Upon considering Gettier cases, some people have the intuition that S doesn't know that p in Gettier cases.
2. The best explanation for (1) is that knowledge is not JTB.
3. No other hypothesis explains (1) as well as the “knowledge is not JTB” hypothesis.
4. Therefore, knowledge is not JTB.

Of course, it is not enough to simply assert that one’s hypothesis is the best explanation for some phenomenon. To properly evaluate an IBE, we need to compare the competing hypotheses in terms of criteria for selecting the best explanation among competing hypotheses.⁴⁴ In this case, the two competing hypotheses are Atkins’ hypothesis that some people report having the so-called “Gettier intuition” when they consider Gettier cases because knowledge is not JTB, which means that the content of the so-called “Gettier intuition,” namely, $\langle S \text{ doesn't know that } p \text{ in a Gettier case} \rangle$ is true, and my hypothesis that some people report having the so-called “Gettier intuition” when they consider Gettier cases because the cases are misleading.

Now, the following are some common good-making criteria for explanations or criteria for selecting the best explanation among several competing hypotheses:

⁴³ Atkins, “Getting Gettier Right,” 357.

⁴⁴ Moti Mizrahi, “Essentialism: Metaphysical or Psychological?” *Croatian Journal of Philosophy* 14 (2014): 65-72.

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Unification: As a general rule of thumb, choose the explanation that explains the most and leaves the least unexplained things.

Coherence: As a general rule of thumb, choose the explanation that is consistent with background knowledge.

Simplicity: As a general rule of thumb, choose the least complicated explanation, i.e. the one that posits the least causal sequences and entities, and that goes beyond the evidence the least.

Testability: As a general rule of thumb, choose the explanation that yields independently testable predictions.⁴⁵

To determine which hypothesis of the two competing hypotheses at hand is the best explanation for the fact that some people report having the so-called “Gettier intuition,” we need to evaluate each hypothesis in terms of the aforementioned selection criteria.

In terms of *unification*, it looks like both Atkins’ hypothesis and mine, if true, would explain the fact that some people report having the so-called “Gettier intuition.” On Atkins’ hypothesis, some people report having the so-called “Gettier intuition” because *they intuit what is true*, namely, that *S* doesn’t know that *p* in a Gettier case, and so knowledge is not JTB. On my hypothesis, some people report having the so-called “Gettier intuition” because Gettier cases are misleading, and so those who read a Gettier case objectively (in terms of semantic reference) report having the so-called “Gettier intuition,” since on this reading, the content of the belief that is a candidate for knowledge in a Gettier case is true (although it is not the content of the belief the subject actually has in mind).

Unlike Atkins’ hypothesis, however, my hypothesis explains not only why some people report having the so-called “Gettier intuition” but also why some people report no such intuition. For on my hypothesis, those who read a Gettier case subjectively (in terms of speaker’s reference) will not report having the so-called “Gettier intuition,” since on this reading, the content of the belief that is a candidate for knowledge in a Gettier case is not strictly true (which means that the truth condition of the JTB analysis of knowledge is not met). Consequently, my hypothesis explains the most and leaves the least unexplained facts, i.e., it explains both why some people report having the so-called “Gettier intuition” and why

⁴⁵ Moti Mizrahi, “What’s so Bad about Scientism?” *Social Epistemology* 31 (2017): 351-367. For present purposes, this list will do. For a more comprehensive list of selection criteria, see James R. Beebe, “The Abductivist Reply to Skepticism,” *Philosophy and Phenomenological Research* 79 (2009): 605-636.

some do not, whereas Atkins' hypothesis fails to explain why some people do not report having the so-called "Gettier intuition." For this reason, my hypothesis has more unification power than Atkins' hypothesis.

Moreover, Atkins' hypothesis has additional problems in terms of unification that my hypothesis does not. That is, Atkins' hypothesis raises more questions than it provides answers. As an explanation for the so-called "Gettier intuition," Atkins' hypothesis raises a host of metaphysical and epistemological questions about not only the nature of intuitions but also the nature of the concepts (such as knowledge) they supposedly track with great accuracy. What are intuitions? Where do they come from? What are the objects of intuitions? How do intuitions provide access to an unobservable reality of concepts like knowledge, justification, etc.? On the other hand, my hypothesis does not face these problems, since, if my hypothesis is true, then the so-called "Gettier intuition" is not an intuition at all. Rather, it is simply an interpretation we give to a misleading hypothetical case like a Gettier case. Indeed, as I have argued elsewhere,⁴⁶ the philosophical method of considering hypothetical cases as "intuition pumps" probably leads to misinterpretations more often than not. For these reasons, my hypothesis has more unification power than Atkins' hypothesis.

In terms of *coherence*, it is somewhat difficult to say whether Atkins' hypothesis is consistent with background knowledge or not. In one sense, it is inconsistent with background knowledge if the legend about JTB has any truth to it. That is, "Legend has it that the 'traditional' or 'standard' view of knowledge is justified true belief ($K = JTB$) and that this traditional view reigned supreme for decades, centuries even."⁴⁷ Clearly, if the legend is true,⁴⁸ then Atkins' hypothesis, according to which $K \neq JTB$, is inconsistent with background knowledge. In another sense, it is consistent with philosophers' use of the method of cases and appeals to intuition. As mentioned above, however, the method of cases has been subjected to criticism in recent years.⁴⁹

⁴⁶ Moti Mizrahi, "Does the Method of Cases Rest on a Mistake?" *Review of Philosophy and Psychology* 5 (2014): 183-197.

⁴⁷ John Turri, "In Gettier's Wake," *Epistemology: The Key Thinkers*, ed. Stephen Hetherington (New York: Continuum, 2012), 214-229.

⁴⁸ Cf. Julien Dutant, "The Legend of the Justified True Belief Analysis," *Philosophical Perspectives* 29 (2015): 95-145.

⁴⁹ In addition to my papers cited above, see also Avner Baz, "Recent Attempts to Defend the Philosophical Method of Cases and the Linguistic (Re)turn," *Philosophy and Phenomenological Research* 92 (2016): 105-130.

On the other hand, my hypothesis is consistent with a vast, multidisciplinary literature on ambiguity in natural language. As Lee and Federmeier put it: “Ambiguity is a central feature of language at many processing levels; at the level of words, it is well documented that a single spelling or pronunciation is oftentimes associated with multiple meaning senses.”⁵⁰ According to my hypothesis, there is an ambiguity in Gettier cases, which means that they lend themselves to two interpretations: an objective interpretation in terms of the semantic referents of the key terms in the content of the relevant belief and a subjective interpretation in terms of the speaker's referents of the key terms in the content of the relevant belief. For these reasons, my hypothesis is more coherent (i.e., consistent with background knowledge) than Atkins' hypothesis.

In terms of *simplicity*, Atkins' hypothesis is quite extravagant ontologically speaking. For his hypothesis to be true, there must not only be such things as intuitions but also a faculty (or perhaps several faculties) of intuition. Moreover, there must also be abstract objects of some kind that are the objects our intuitions somehow latch onto. As Katz puts it, “intuition is a faculty for acquiring knowledge about abstract objects.”⁵¹ On the other hand, there need be no such things as intuitions, faculties of intuition, or abstract objects other than language for my hypothesis to be true. For my hypothesis postulates the existence of no such things. It simply states that there is an ambiguity in hypothetical cases known as “Gettier cases” insofar as these cases lend themselves to two different interpretations. Unlike intuitions, faculties, and abstract objects, which are rather mysterious things, ambiguity is a familiar feature of natural language. For these reasons, my hypothesis is simpler than Atkins' hypothesis.

In terms of *testability*, experimental philosophers have conducted experimental surveys using Gettier cases as vignettes given to both professional philosophers and non-philosophers. The results of a recent large-scale, cross-cultural, and cross-linguistic study suggest that most people do report having the so-called “Gettier intuition,” although whether they report having the so-called “Gettier intuition” or not is affected by age, personality, and reflectivity,⁵² which

⁵⁰ Chia-lin Lee and Kara D. Federmeier, “In a Word: ERPs Reveal Important Lexical Variables for Visual Word Processing,” in *The Handbook of the Neuropsychology of Language*, ed. Miriam Faust (Malden, MA: Wiley, 2012), 184-208.

⁵¹ Jerold Katz, *Language and other Abstract Objects* (Totowa, NJ: Rowman & Littlefield, 1981), 194.

⁵² Edouard Machery, Stephen Stich, David Rose, Mario Alai, Adriano Angelucci, Renatas

are factors that are supposedly irrelevant to the truth or falsity of the content of the so-called “Gettier intuition,” namely, $\langle S \text{ doesn't know that } p \text{ in a Gettier case} \rangle$.⁵³ This means that Atkins’ hypothesis and mine can be tested empirically, given that they are hypotheses about Gettier cases and people’s responses to these cases. However, unlike Atkins’ hypothesis, which predicts that people will report having the so-called “Gettier intuition” but does not predict that such reports will be influenced by factors, such as age, personality, and reflectivity, as well as contextual factors, such as framing,⁵⁴ my hypothesis predicts the influence of such extraneous factors on people’s responses to Gettier cases. For studies in psycholinguistics show that the way people resolve ambiguity and select meaning is determined by context.⁵⁵ So the influence of contextual factors, e.g., framing effects,⁵⁶ on people’s responses to Gettier cases is a prediction that my hypothesis, but not Atkins’, makes successfully.

The crucial question, however, is whether Atkins’ hypothesis and mine can be tested in an independent way, i.e., a way that is intuition-free. After all, the so-called “Gettier intuition” is precisely what our hypotheses are supposed to explain (or explain away) in the first place. Since the so-called “Gettier intuition” is the *explanandum*, we need independent evidence, i.e., evidence that is independent of people’s intuitions, for or against the competing hypotheses in question. Is there an intuition-free way to test Atkins’ hypothesis that many people report having the so-called “Gettier intuition” because they *intuit* what is true (i.e., that $K \neq \text{JTB}$)? I cannot think of one. After all, Atkins’ hypothesis is that people report having the so-called “Gettier intuition” precisely because they *intuit* what is true, namely, that S doesn't know that p in a Gettier case. (Of course, that doesn't necessarily mean there is no intuition-free way to test Atkins’ hypothesis. Perhaps there is, even though I cannot think of any.)

Berniūnas, Emma E. Buchtel, Amita Chatterjee, Hyundeuk Cheon, In-Rae Cho, Daniel Cohnitz, Florian Cova, Viluis Dranseika, Ángeles Eraña Lagos, Laleh Ghadakpour, and Maurice Grinberg, “The Gettier Intuition from South America to Asia,” *Journal of the Indian Council of Philosophical Research* 34 (2017): 517-541.

⁵³ Moti Mizrahi, “Three Arguments against the Expertise Defense,” *Metaphilosophy* 46 (2015): 52-64.

⁵⁴ Wesley Buckwalter, “Gettier Made ESEE,” *Philosophical Psychology* 27 (2014): 368-383.

⁵⁵ Gabriella Airenti and Alessio Plebe, “Context in Communication: A Cognitive View,” *Frontiers in Psychology* 8 (2017): 6-8.

⁵⁶ Buckwalter, “Gettier Made ESEE,” 368-383.

On the other hand, my hypothesis can be tested in a variety of independent ways. For example, studies in psycholinguistics suggest that verbal ability (i.e., vocabulary size) is predictive of sensitivity to referential ambiguity (of the sort I claim occurs in Gettier cases).⁵⁷ Accordingly, if my hypothesis is true, we would expect verbal ability to have an effect on whether people can pick up on the referential ambiguity in Gettier cases. In fact, there may already be evidence pointing in that direction. Machery et al. found that Bedouins from Israel were significantly less likely to share the so-called “Gettier intuition.”⁵⁸ On my hypothesis, this fact makes sense, given that level of education is a reliable predictor of verbal ability, and that the socioeconomic status and level of education of the Bedouin population of Israel “tend to be amongst the lowest in the country.”⁵⁹ Accordingly, if my hypothesis is true, then verbal ability would have an effect on whether one is sensitive to the objective interpretation of Gettier cases (in terms of semantic reference), the subjective interpretation of Gettier cases (in terms of speaker’s reference), or to both.

To sum up, Atkins asserts without argument that “knowledge is not justified true belief” provides “a much better account of” the so-called “Gettier intuition” than my account of the semantic failure (referential ambiguity) in Gettier cases. When our competing accounts are evaluated in terms of criteria for selecting the best explanations among competing hypotheses, however, my account emerges as the better hypothesis. My hypothesis has more unification power, is more coherent, and is simpler than Atkins’ hypothesis. Moreover, unlike Atkins’ hypothesis, my hypothesis yields predictions that can be tested independently of intuitions.

5. Conclusion

In this paper, I have shown that Atkins continues to engage in intuition mongering when he insists that he has the so-called “Gettier intuition” in the face of an

⁵⁷ See, e.g., M. A. Boudewyn, D. L. Long, M. J. Traxler, T. A. Lesh, S. Dave, G. R. Mangun, C. S. Carter, T. Y. Swaab, “Sensitivity to Referential Ambiguity in Discourse: The Role of Attention, Working Memory, and Verbal Ability,” *Journal of Cognitive Neuroscience* 27 (2015): 2309-2323.

⁵⁸ Machery et al., “The Gettier Intuition from South America to Asia,” 517-541.

⁵⁹ Miriam Amit and Fouze Abu Qouder, “Weaving Culture and Mathematics in the Classroom: The Case of Bedouin Ethnomathematics,” in *Ethnomathematics and its Diverse Approaches for Mathematics Education*, eds. Milton Rosa, Lawrence Shirley, Maria Elena Gavarrete, and Wilfredo V. Alanguí (Gewerbestrasse: Springer, 2017), 23-50.

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interlocutor who clearly does not find it intuitive at all that *S* doesn't know that *p* in a Gettier case. As I have argued before, Gettier cases are misleading, since they merely appear to be cases of knowledge failure but in fact they are cases of semantic failure, and so we should not put much trust, if any, in what seems to be true about these cases, let alone draw any general conclusions from them about the nature of knowledge.

I have also shown that Atkins' attempts to revise Gettier's original cases such that they do not involve semantic failures are unsuccessful, since he fails to take into consideration the fact that knowledge is a mental state, that 'handsomeness' is referentially ambiguous in his revision of Gettier's Case I, and that what is true about one's past self may no longer be true now (or will no longer be true about one's future self).

Finally, I have argued that his admission that intuitions are defeasible, not conclusive, evidence for or against philosophical theories suggests that his argument against my diagnosis of Gettier cases as misleading is an IBE. It is a rather weak IBE, however, because Atkins simply asserts without argument that his hypothesis (i.e., that $K \neq JTB$) is the best explanation for the fact that many people report having the so-called "Gettier intuition." When his hypothesis and mine are evaluated in terms of commonly accepted selection criteria, such as simplicity and testability, my hypothesis outperforms his on all counts.⁶⁰

⁶⁰ I am grateful to Eugen Huzum for inviting me to reply to Philip Atkins.