GETTIER CASES, MIMICKING, AND VIRTUE RELIABILISM

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ABSTRACT: It has been argued that virtue reliabilism faces difficulties in explaining why the "because-of" relation between true belief and the relevant competence is absent in Gettier cases. However, prominent proponents of this view such as Sosa and Turri suggest that these difficulties can be overcome by invoking the manifestation relation. In his *Judgment and Agency*, Sosa supports this claim based on an analogy between Gettier cases and what in the literature on dispositions is called mimic cases. While there are initial motivations for the alleged analogy, I claim there are at least two arguments against it: 1. there is an asymmetry in the nature of context-sensitivity between the problem of mimicking and the Gettier problem; 2. while causal deviance and double luck can be found in both the mimic case and the Gettier case, their causal processes are different in important respects, making it challenging to see them as both falling under the same category. If these arguments are on the right track, the upshot is that virtue reliablists such as Sosa and Turri who describe the "because-of" relation in terms of the manifestation relation still owe us an account of why the manifestation relation is absent in Gettier cases.

KEYWORDS: Gettier cases, mimic cases, virtue reliabilism, because-of relation

Introduction

Virtue reliabilists propose to think of Gettier cases as cases in which a subject has both a relevant competence and a true belief, whereas her belief is not true *because of* her relevant competence. However, it has been argued that virtue reliabilism faces challenging problems in explaining the "because-of" relation.[1] While it seems that in Gettier cases there is a kind of causal relation between the subject's competence and her true belief, it is claimed that the relation is not established "in the right and appropriate way;" the burden, nevertheless, is on the virtue reliabilist to make clear

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[1] For a good review of the various suggestions virtue epistemologists propose for understanding the "because-of" relation, and the problems (including problems raised by Gettier cases) each of these suggestions encounters, see Greco (2012), who, in particular, discusses difficulties for four ways of understanding the "because-of" relation (the primitive, the metaphysical, the explanatory, and the epistemic understandings). Greco (2012) suggests instead that this relation should be understood as a pragmatic relation. However, it has been argued that his account is vulnerable to Gettier-style counterexamples too. For example, Miracchi (2015, 35) argues that Greco's pragmatic account delivers the wrong verdict in a case which she calls "a systematic Gettier case" (Miracchi 2015, 39).

what "the right and appropriate way" is. By invoking the manifestation relation, virtue reliabilists such as Sosa (2015; 2017) and Turri (2011; 2012) argue that virtue epistemology can overcome these difficulties. For example, in *Judgment and Agency* Sosa (2015, 31) writes:

> Manifestation enables us to go beyond the need to rely on 'the right way,' or on 'an appropriate way,' or any such phrase. The manifestation of competences and other dispositions then provides a solution to the problem of specifying 'the right or appropriate way' as it pertains to action, perception, and knowledge.

To defend the idea, virtue reliabilists draw an analogy between Gettier cases and a familiar case in the literature on dispositions. In particular, Sosa (2015, 29-31) proposes that Gettier cases are similar in relevant respects to cases which, in the literature on dispositions, are called *mimic cases*, claiming that in both cases the manifestation relation is absent. Given this analogy between being mimicked and being gettiered (I will refer to this henceforth as "the alleged analogy"), Sosa and his supporters can suggest that, in Gettier cases, manifestations of knowledge-constitutive competences are really absent and merely *mimicked*. Therefore, we can define knowledge as genuine manifestations of knowledge-constitutive competence by excluding these cases of mimicking.[2] In which case, given the alleged analogy,

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[2] There is a controversy over what Sosa and other virtue reliabilists think about the precise *stimulus* condition of a knowledge-constitutive competence. For example, Miracchi (2015, ftn.18) writes: "Both Sosa and Greco hold that … a competence is a disposition to believe truly *when one believes*" (emphasis added) (see, also, Sosa (2007, 29) and (2010, 466)). On the other hand, in *Judgment and Agency* it seems that Sosa (2015, 96) thinks of *trying* to do something as the stimulus condition of a competence: "A competence is a certain sort of disposition to succeed *when you try*" (emphasis added). It has been argued that each option (either believing or trying to believe) has its own problems. For example, Vetter and Jaster (2017) argue that if we describe trying to do something as the stimulus condition of competence, we face "the problem of wrong stimulus." Sosa (2015, 47) himself takes examples of "the [perceptual] belief that the room has gone dark [after turning off the lamp]" as a matter of "passive reactions that approximate or constitute mere reflexes," claiming that, in cases like this, "there is no freedom to intervene in what seems clearly to be a belief." Therefore, it may be infelicitous to say we *try* to believe in such cases. One the other hand, if we think that in the virtue reliabilist's view the stimulus is believing itself, Vetter and Jaster (2017, 7) claim we face a problem they call "the problem of triviality." Besides these problems for finding the precise stimulus condition, there are more general problems for a dispositional account of rational capacities such as competence (see, for example, Clarke 2015 and Riley 2017). I want to remain silent about these problems. Of course, to exclude the mentioned prima facie counterexamples to trying to believe, following Miracchi in her interpretation of Sosa and Greco, I consider believing (instead of trying to believe) as the stimulus condition of the competence in the virtue reliabilist's view. However, readers should note that sometimes believing requires trying or wanting to believe. Nonetheless, neither the controversy about the precise stimulus condition

knowledge is a manifestation of the disposition to justified true belief when one believes *in the absence of mimickers*.[3] In what follows, however, I argue against the alleged analogy, showing that virtue reliabilists cannot appeal to mimic cases to avoid difficulties raised by the 'because-of' relation.'

To this end, the paper proceeds as follows: In section 1, after a brief sketch of the idea of mimic dispositions and the Gettier challenge, I set out what initial motivations support the alleged analogy. Section 2 is devoted to showing that Sosa's version of the mimic case is not the standard version of this case. Then, in section 3, I follow two lines of argument against characterizing Gettier cases as instances of either paradigm cases of mimicking or Sosa's version of it.

1. Some Initial Motivations for the Alleged Analogy

Philosophers standardly characterize a disposition in terms of its manifestation and stimulus conditions. Consider, for instance, fragility as the paradigm case of dispositions. That a glass is fragile means that it is disposed to break when struck. For many years, the widely accepted account of dispositions was the simple conditional analysis, on which a glass is fragile iff it would break if struck. This analysis has, recently, been subject to various counterexamples. The mimic case is one of these counterexamples: here, while the relevant disposition is absent, the conditional is fulfilled.[4] Consider the following case from Smith (1977) as a paradigm case of mimicking.

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nor the more general problems for a dispositional account of competence are the focus of the present paper.

[3] Notice that, in Sosa's view, the competence which is relevant to knowledge is not every disposition to true belief when one believes; rather it is a disposition to *justified* (or in Sosa's words *in a weak sense of the term* '*competent*') true belief when one believes. Sosa (2015, 24) writes that a kind of luck "precludes Gettiered subjects from knowing something even when they believe it both correctly and competently." Thus while Gettiered subjects don't manifest knowledge, they manifest a disposition to justified true (or in Sosa's terms, competent correct) belief when one believes. The gettierized true belief is competent because it is acquired in virtue of the subject's *seat* (and not an external basis). However, we ought to be cautious about claiming that it is competent in a strong sense of the term, since it is not the manifestation of the relevant knowledge-constitutive competence. Thus the first approximation of the competence which constitutes knowledge is disposition to justified (or competent in a weak sense of the term) true belief when one believes. We should exclude Gettier cases from this competence to arrive knowledge-constitutive competence. Therefore, a knowledge-constitutive competence is a disposition to justified true belief when one believes *excluding Gettier cases*. Given the alleged analogy according to which being gettiered is an instance of mimicking, knowledge would be the manifestation of a disposition to justified true belief when one believes *in the absence of mimickers*.

[4] Finkish and masked dispositions are other kinds of counterexamples to the simple conditional

The case of Z-ray

Suppose there is a sturdy block of wood which is struck, for example, by a stone. Imagine that this strike produces a signal which immediately leads aliens to attack the block with a very powerful ray (Z-ray), which causes the block to splinter. While the block, ex hypothesi, is not fragile, by mimicking fragility, it would break when struck. Thus the simple conditional analysis makes a false prediction about the ascription of dispositions.[5]

Turning to Gettier cases, consider the following case from Gettier (1963), taken as the standard Gettier case.

The case of Smith

Smith and Jones have applied for a certain job. Smith has strong evidence that Jones will be selected. He also knows that Jones has ten coins in his pocket. Plausibly, Smith is justified in believing that p: 'the man who gets the job has ten coins in his pocket.' However, unbeknownst to Smith, he himself, and not Jones, will be selected and has ten coins in his pocket. Therefore, while Smith has a justified true belief that p, we have a strong intuition that he does not know that p.

Moreover, Sosa (2015, 13) describes the following case as a paradigm of the practical Gettier case.

The case of Archery

Suppose Archie is a skillful archer, taking a competent shot. Although the first gust of wind diverts the shot, the second one puts it again on the right track. Luckily, the shot hits the target, but Archie does not deserve credit for her success. While Archie's performance is accurate (successful) and adroit (competent), it is not apt since its accuracy does not manifest its adroitness.

Sosa does not give a detailed account of how Gettier cases are analogous to mimic cases. However, there are clear initial motivations for positing an analogy between them. For example, in both cases, success is due to a kind of causal deviance and double luck.[6] In the case of Archery, the first (bad) luck is that the first gust of wind diverts the shot, and the second (good) luck is that the second gust puts it on the right track. Likewise, in the case of Z-ray, the block's not breaking when struck by a stone is the first (bad) luck; but that it leads aliens to fire their Z-ray is the second (good) luck.

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analysis. I do not discuss these two cases in what follows.

[5] Another famous paradigm case for mimicking, from Lewis (1997), is the case of breaking a Styrofoam dish. The case of Z-ray and the case of Styrofoam dish have the same structure.

[6] Zagzebski (1966, 288-289) argues that all Gettier cases have a "double luck" structure.

Furthermore, to see a deeper similarity between these cases, note that philosophers find it helpful to distinguish between conventional and canonical dispositions.

> Conventional dispositions are typically expressed by such simple predicates as 'fragile,' … which include no explicit reference to their stimulus conditions and manifestations. Canonical dispositions, on the other hand, are explicit about their stimulus conditions and manifestations, … [for example] the disposition to break in response to being struck. (Choi and Fara 2018)

With this distinction to hand, a proponent of Sosa's view may argue in favor of the alleged analogy as follows: Both fragility and competences are conventional dispositions. On the one hand, the first approximation of a formulation of the concept of fragility is the following canonical disposition: the disposition to break when struck (call it D1 for short). On the other hand, the first approximation of formulation of the concept of competence which constitutes knowledge is the following canonical disposition: the disposition to justified true belief when one believes (D2). In the case of Z-ray, while there is a pre-theoretical intuition which falsifies the ascription of fragility to the block, the canonical disposition D1 is manifested with the help of a mimicker. Likewise, in the Gettier case, while there is a pre-theoretical intuition which avoids the attribution of knowledge to the subject, the canonical disposition D2 is manifested with the help of a mimicker. Therefore, to the extent that fragility can be described as the disposition to break when struck *in the absence of mimickers*,[7] knowledge-constitutive competence can be defined as the disposition to justified true belief when one believes *in the absence of mimickers*. In which case, knowledge is *the manifestation* of the disposition to justified true belief when one believes *in the absence of mimickers*. It seems that, with the manifestation relation and the alleged analogy to hand, virtue reliabilists can provide a solution to problems raised by Gettier cases in explaining the "because-of" relation.[8]

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[7] For such an account of fragility as a conventional disposition, see Choi (2006, 376). Of course, Choi excludes not only mimickers but also maskers and finks from the definition of fragility. The same can be said for knowledge. Moreover, elsewhere Choi (2008, 31) appeals to the constraint of non-ordinary conditions to give a general definition of mimickers. A similar line of thought is pursued by Sosa (2015, 30). I return to this point below.

[8] Miracchi (2015, 36) writes that "Sosa claims that Gettier cases are also cases of mere mimicking a manifestation of a disposition to believe truly." She complains (*ibid.*, 36-37) that "For Sosa's argument by analogy to be effective, the cases involving glasses that are structurally analogous to Gettier cases cannot be ones in which a glass manifests its disposition to shatter upon hitting something hard.… Sosa thus cannot appeal to intuitions about whether fragility is characteristically manifested in analogous cases, but rather he must appeal to intuitions about

2. Sosa's Version of Mimicking

Before turning to an examination of the alleged analogy, it is worth noting that Sosa (2015, 29) introduces a somewhat different version of the mimic case:

> *The case of Zapper*
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> Recall the mimicking of fragility when a fine wine glass is zapped upon hitting the hard floor. By hypothesis, the causal action of our zapper trumps the inner structure of the glass, whereby it normally shatters on impact. Still that inner structure can be causally operative, as it is through the agency of the zapper (who hates the impact on the hard floor of the fragility that he spots in the fragile glass). Despite being causally operative in that way, through the knowledge of the zapper, that inner structure is not causally operative in the right way. And this is why the fragility that we normally attribute to the glass is not really manifest on that occasion.

The crucial difference between the case of Z-ray and the case of Zapper is that while the wine glass is fragile in the latter, the block is not fragile in the former. However, there is a simple argument that Sosa's version of mimicking is not a standard instance of a mimic case. These standard instances are mimics "because they are circumstances that mimic the action of a disposition, in that they make the relevant counterfactual true. But there is no genuine disposition at all" (Bird 2007, 29). However, in the case of Zapper, by hypothesis, the genuine disposition (i.e., fragility) is present, and so, unlike Z-ray, Zapper cannot be a counterexample to the conditional analysis of dispositions. Sosa may respond that while the case of Zapper is not a standard instance of a mimic case, it is still a kind of mimicking because the manifestation (i.e., the breaking of the wine glass) does not manifest in virtue of the genuine disposition (i.e., the fragility of the wine glass); rather, in this special circumstance, the wine glass just mimics fragility. I am not sure that all prominent analyses of dispositions support this claim.[9] However, examining it is beyond my

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dispositions that are more clearly similar in structure to dispositions to believe truly." If Miracchi means mimic cases are not analogous to Gettier cases in relevant respects and that Sosa should appeal to cases that are more structurally similar to Gettier cases, I would agree with her. However, I don't know what reasons Miracchi has for this claim. As argued above, in both Gettier cases and mimic cases, we have a strong intuition that the conventional dispositions are not genuinely manifested whereas the canonical dispositions which are the first approximations of those conventional dispositions are clearly manifested. Therefore, we need an argument to show that Gettier cases and mimic cases are not analogous in the relevant respects. However, Mirachi addresses another worry about Sosa's account to which I am more sympathetic. See ft.14

[9] For example, it seems that on Manley and Wasserman's view if an object would break in some suitable proportion of stimulus conditions, its breaking is the manifestation of fragility "even if [the] object happens to be in 'bad' case" such as the case of Zapper (Manley and Wasserman 2008,

purpose here. What is important is whether either the standard mimic case or Sosa's alleged version of mimicking is analogous to Gettier cases. Thus, for the sake of argument, I assume that the case of Zapper is a different kind of mimicking, and I call this Sosa's version of mimic cases (in short, SV-mimic case).

3. Against the Alleged Analogy Between Being Gettiered and Being Mimicked

I follow two lines of argument against Sosa's analogy between being gettiered and being mimicked, showing that it would be difficult to think of the Gettier case as an instance of the mimic case.

An asymmetry in context-sensitivity:

As Manley and Wasserman (2007, 3) illustrate, many dispositional ascriptions are context-sensitive:

> Many dispositional predicates behave in exactly this way. Not only do they have straightforward comparative uses, but the corresponding positives are often context-dependent. An ordinary plastic cylinder may truthfully be described as 'fragile' in the aeronautical testing facility, for example, but not in the kitchen.

With this in mind, we can argue against Sosa in the following way: the language with which we speak about both the paradigm cases of mimicking and the gettiered justified true belief is context-sensitive. However, while in the paradigm case of mimicking, a context of assertion can be found in which the problem of mimicking disappears such that we can attribute the genuine disposition, there is not any context of assertion in which the Gettier problem vanishes such that we can attribute knowledge. This asymmetry supports the idea that the nature of being mimicked and being gettiered are not the same.

In order to motivate the claim, imagine that, in the case of the Z-ray, the context of assertion would be that we are searching for a material that can be used for protecting us against aliens' terrorist attacks by the Z-ray. Imagine, also, that there is a special kind of steel (call it K-steel) which would not break when beamed at by the Z-ray. In this context, it would be reasonable to say that, in contrast with K-steel, the block of wood is fragile. Thus, while the breaking of the block of wood is characterized as the manifestation of a mimic case in an everyday context, it can be described as the manifestation of genuine fragility in the context of defending against alien attack. On the other hand, it is highly doubtful that changing the context of assertion can make the Gettier problem disappear. Recall the case of Smith as a paradigm of epistemic Gettier cases. By changing the context of assertion, we

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76). The same idea can be found in Vetter (2014).

can increase (or decrease) the standard of justification or competency. However, it does not lead us to ascribe knowledge to Smith.[10] As a result, there is a crucial difference between the context-sensitivity of the Gettier case and the mimic case, showing that they have different natures.

The same observation applies to the SV-mimic case. To see how, consider the case of weird glass.

The case of weird glass

Consider a glass that breaks if struck in normal conditions and by a standard process. Also, imagine that this glass has a weird characteristic such that it would not break in non-normal conditions like the condition of the case of zapper in which the zapper hits it firmly on the hard floor.

Now, suppose that, in the case of Zapper, the context of assertion is that we are comparing the wine glass with the weird glass. In this context, it would be plausible to say that, in contrast with the weird glass, the wine glass is fragile and manifests fragility in that circumstance. Therefore, unlike the Gettier problem, there are contexts of assertion in which both the problems of standard mimicry and SV-mimicry vanish.

Indeed, we can argue for a stronger claim. In particular, we can take an example of a disposition which constitutes knowledge and is described as a mimic case in the everyday context. Then, we can show that, by changing the context of assertion, the same knowledge-constitutive disposition can be described as a genuine

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[10] Of course, some epistemic contextualists such as Lewis (1996) and Greco (2003, 2010, 2012) employ contextualist insights to provide a new solution to the Gettier problem. However, notice that not only is this solution not adopted by philosophers who do not accept epistemic contextualism, but also that "this remains a much more controversial move [even] among proponents of EC [i.e., epistemic contextualism]" (Rysiew 2020) (see, for example, Cohen (1998)). Moreover, to my knowledge, neither Lewis nor Greco argues in favor of the claim that by changing the context of assertion the Gettier problem disappears in such a way that we can properly ascribe knowledge to the subjects. Rather, "according to them, EC [i.e., epistemic contextualism] explains why certain cases of justified true belief are not correctly said to be 'knowledge,' as Gettier showed" (*ibid.*). For example, Greco (2003, 131) argues that explanatory talk is context-sensitive, and, in Gettier cases, "there is something odd or unexpected about the way that S comes to believe the truth, and that the salience of the abnormality trumps the default salience of S's cognitive abilities." However, he does not introduce a new context for Gettier cases according to which the way that S comes to believe the truth can be thought of as a normal way, and therefore we can properly ascribe knowledge to the gettiered subject. Nevertheless, even if Greco's virtue contextualist makes room for the claim that by shifting the context of assertion knowledge can be correctly ascribed to the gettiered subject, what is important for the present project is that Sosa and Turri, whose virtue reliabilist accounts are the main focus of the present paper, do not endorse such an idea. For Turri's arguments against epistemic contextualism, see Turri (2017).

disposition. To see how, consider the faculty of human vision understood in terms of a conventional disposition. A reasonable approximation of the concept of human vision is the following canonical disposition: the disposition to see objects in front of us when we want or try to see[11] (for short, D3). Now consider the case of I-ray:

> The case of I-ray
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> Imagine Mary desires to see the electrons of the table in front of her, and says so loudly. Imagine, also, that kind aliens detect the signal of her voice and so beam an I-ray at the table, in virtue of which Mary can see the electrons of the table in front of her.

In the everyday context of assertion, we have a pre-theoretical intuition that the faculty of human vision (as a conventional disposition) does not involve seeing electrons. However, in the case of I-ray, the reasonable approximation of human vision, i.e., the canonical disposition D3, manifests provisionally in virtue of an abnormal causality in the background conditions. Given the structural similarity to the case of Z-ray, it is fair to say that the case of I-ray is a mimic too. While the faculty of human vision is mimicked in this case, it can still constitute Mary's perceptual knowledge of the electrons. Therefore, it is not the case that an epistemic disposition's being mimicked entails its being gettiered. Moreover, similar to the case of Z-ray, mimicry can disappear in the case of I-ray by changing the context of assertion. Imagine the context of assertion is that we are comparing Mary with Gary, who is blind, but shares and expresses the same wish to see electrons, and that kind aliens beam their I-ray at the table in front of him too; however, because of his blindness, Gary cannot see the electrons. In this context, it would be plausible to say that, in contrast with Gary, Mary manifests the faculty of vision of the electrons. By changing the context, while the ascription of mimicking varies, the ascription of knowledge remains constant.

It is an easy step to alter the case of I-ray so that it is a case of an SV-mimic. For example, we can imagine that technology progresses, and a kind of spectacles are invented with which people can see electrons. Therefore, while there is a normal

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[11] Again, here the controversies about the proper option for the stimulus condition of competence we considered in ft.2 may return. One might worry that vision is a kind of competence whose stimulus condition does not involve trying or wanting. In reply, notice that in a weak sense of the term most cases of the manifestation of vision do proceed by wanting. If I don't want to see the scene in front of me, I close my eyes and I don't perceive it. Moreover, in some cases, manifestations of vision require wanting and trying in a stronger sense. For example, when I want to find, say, a needle in a haystack. However, as said above, the controversies about the stimulus condition of competence is not the focus of the present project, and we can easily change the example such that it does not require wanting or trying.

way of seeing electrons which is available for Mary, she sees them in virtue of an abnormal causality. Likewise, the SV-mimic vision of Mary can constitute her perceptual knowledge of electrons. Again, in the context of comparing with Gary, the mimic attribution disappears while the knowledge attribution remains constant.

As a result, the asymmetry in the nature of context-sensitivity between the problem of mimicking (or SV-mimicking) and the Gettier problem suggests that they are not of the same kind.

Different Causal Deviances and Double Luck

Comparing the case of Z-ray (as a mimic case) and the case of Archery (as a practical Gettier case), I argue in what follows that while causal deviance and double luck can be found in both the mimic case and the Gettier case, their causal processes are different in important respects, making it challenging to see them as both falling under the same category. In the case of Archery, Archie has an internal competence which causes shooting. The causal deviance (through the double gust of wind) comes *after* the manifestation of Archie's internal competence. One might think that the same goes for the case of the Z-ray. When the stone strikes the block of sturdy wood, it has an intrinsic property that produces a signal, and causes aliens to beam the Z-ray at it. It seems that the causal deviance comes after the intervention of the block. However, there is a crucial difference which needs careful consideration. Despite the case of Archery in which the final cause is not the internal structure of Archie, the final chain of the causal process in the case of the Z-ray is the internal structure of the block. In other words, the internal structure of the block *directly* causes (and manifests) breaking, allowing us to describe it as *the breaking of the block*. On the other hand, however, the second gust of wind (and not the internal competence of Archie) is the direct cause of her hitting the target, which does not allow us to credit the success to Archie's competence. Despite an initial appearance to the contrary, there are two different kinds of causal processes and double lucks in the mimic case and the Gettier case, which makes it more unlikely that the latter would be an instance of the former.

The observation made in the above paragraph about the case of Z-ray and mimicking can equally be applied to the case of Zapper and SV-mimicking. Likewise, the final chain of the causal process in the case of Zapper is the internal structure of the wine glass, and this structure *directly* causes (and manifests) breaking, allowing us to describe it as the *breaking of the wine glass*. Therefore, the causal deviance and double luck in both the mimic and the SV-mimic cases come before the intervention of the relevant internal structure of the object, and they differ from the Gettier cases in this respect.

Of course, because of the involvement of a kind of double luck, a piece of knowledge constituted by a mimicked disposition may be unsafe in some sense. However, the crucial point is that, to the extent that the double luck in a mimic case does not intervene between cognitive ability and cognitive success, some virtue epistemologists such as Sosa (2015) and Turri (2011) must be willing to describe the case as a kind of knowledge. To illustrate the point, consider Sosa's case of Simone, a competent pilot "who might easily be, not in a real cockpit, but in a simulation, with no tell-tale signs" (Sosa 2015, 146). Sosa clearly asserts that Simone's belief about her competent shots in real flying is backwards-unsafe (152). However, "Simone does have a kind of knowledge [i.e., animal knowledge], … since she does have an apt belief" (147). While being unsafe in some sense, her belief is apt because it directly manifests her cognitive competence, and no luck intervenes. Now consider again the case of I-ray as a case of epistemic mimic case. Since Mary's seeing the electrons is a matter of sheer chance, some epistemologists may seek to avoid an ascription of knowledge to her. However, to the extent that Mary's success in seeing the electrons is a direct manifestation of her internal ability, and no luck intervenes between them, Sosa and his supporters concede that she has an animal knowledge.

4. Concluding Remarks

Is the Gettier case an instance of mimic cases? Given the initial motivations for an analogy between these two cases provided in section 1, I think the question deserves independent consideration. Here, however, we have discussed it in the context of the challenge which virtue reliabilists face in spelling out the "because-of" relation between true belief and competence. While there are clear initial motivations for the alleged analogy, a closer look reveals that standard mimic and SV-mimic cases differ from practical and epistemic Gettier cases in important respects, making it difficult to see how both can be of the same kind.

As concluding remarks, let us review the upshot of the present discussion for virtue reliabilism. John Turri (2011), who thinks of the "because-of" relation in terms of the manifestation relation, suggests that we should understand the manifestation relation as primitive. However, as Greco (2012: 8) and others argue, Turri owes us an account of why the manifestation relation is absent in the Gettier case. In his dispositional account of knowledge in *Judgment and Agency*, Sosa combined the manifestation relation with the alleged analogy to put the issue in a broader context and provide a more promising diagnosis of the Gettier problem. However, if my argument in the present paper is on the right lines, Sosa's alleged analogy is not tenable; and therefore, like Turri, he still owes us an account of why the manifestation relation is absent in the Gettier case.

However, it is worth noting that the conclusion of my argument here must be restricted to standard instances of mimic cases and Sosa's version of them. It is still possible that someone may develop an importantly different idea of mimicking, such as extrinsic mimicking (Contessa 2013, 416), or contingent mimicking (Bird 2007, 27), or Achilles-like mimicking (Manley-Wasserman 2008), in virtue of which they might argue that the Gettier case is an instance of that different idea of mimicking. However, the burden of proof is on Sosa and his supporters to identify which kind of the non-standard cases of mimicking is analogous to the Gettier case and set out what arguments support the new alleged analogy.[12]

If Sosa and Turri put forward such arguments and can establish an analogy between the Gettier case and a special non-standard version of mimicking, they would have shown that knowledge is the manifestation of the disposition to justified true belief when one believes *in the absence of that special kind of mimickers*. However, even this is not sufficient to show that the *reductive* dispositional virtue epistemology suggested by Sosa and Turri is on the right track. Because, in the literature on dispositions, there are arguments in favor of the idea that mimickers (like maskers and finks) cannot be excluded without appealing to the genuine manifestation relation itself. For example, given that many (including Sosa (2015, 30) himself)[13] think of mimicking situations as abnormal, or non-ideal, or non-normal, Cross (2011, 3) writes: "The standard complaint against all such attempts at qualification is that… the abnormal or non-ideal or non-normal seems to be nothing more than the cases where if x were in C, x would not M [i.e., manifest]." Given such a complaint, there is a worry that, in excluding that special kind of mimicking, knowledge-constitutive competence cannot be defined without appealing to knowledge itself.[14] If so, this would be a reason in support of the *non-reductive* dispositional virtue epistemology suggested by Miracchi (2015) and Kelp (2017)

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[12] Another line of argument in favor of a similar idea is to draw an analogy between mimic dispositions and cases which are not Gettier cases but are counterexamples to various analyses of knowledge. For example, Beddor and Pavese (2020, 68-70) argue that there is an analogy between the standard mimic disposition and the case of Temp suggested by Pritchard (2012) as a counterexample to the sufficiency of the safety condition for knowledge. I do not discuss this line of argument here.

[13] Sosa (2015, 30) writes: "The example of fragility zapped suggests that a disposition can be manifest in a certain outcome only if it accounts *appropriately* for that outcome … [T]his must take place in the normal way, which by common consent excludes the action of our zapper, even when he does deviantly manage to link the trigger with the ostensible manifestation."

[14] Miracchi (2015, 37) raises a similar worry when she writes: "The critical question is whether, by appealing to the idea of a *characteristic manifestation* of a disposition, Sosa is in fact appealing to manifestations of much more fine-grained dispositions—dispositions that, in the epistemic case, are nothing short of dispositions to know."

which understands virtue epistemology as an instance of Williamson's "knowledge-first" approach.

Therefore, to provide a convincing dispositional account of Gettier cases by invoking mimic cases, a proponent of reductive dispositional virtue epistemology such as Sosa and Turri not only needs to find a special non-standard version of mimicking which would be analogous to the Gettier case, but must also show that we can exclude that special version of mimicking without appealing to knowledge itself.[15]

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