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Gettier Cases and Evidence
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Introduction
Gettier’s (1963) two examples are now widely believed to be counterexamples to this JTB account of knowledge:

\[ JTB: \text{A thinker knows that } p \text{ iff } p \text{ is true, the thinker believes that } p \text{ is true, and the thinker is justified in her belief.} \]

Gettier claimed that his cases work equally well against Chisholm’s (1957) ETB account of knowledge:

\[ ETB: \text{A thinker knows that } p \text{ iff } p \text{ is true, the thinker believes that } p \text{ is true, and the thinker has adequate evidence for } p. \]

It’s probably fair to say that most epistemologists agree with Gettier on these points. There seems to be a general consensus that Gettier’s protagonists lack knowledge and that they meet the conditions that these theories propose would be sufficient for knowledge.

Gettier’s cases and Gettier-type cases have played a tremendous role in shaping our understanding of propositional knowledge. As readers are certain to know, there is a vast literature in which people propose alternative accounts of knowledge that are designed to overcome the difficulties that arise for the JTB or ETB accounts and then discover to their chagrin that further counterexamples emerge that show their proposals to be inadequate. In this paper, our primary concern will be with evidence. What can we learn about evidence and its theoretical role by studying Gettier-type cases?

In §1, we shall briefly discuss two Gettier-type cases and the problems that these cases cause for the ETB account. In §2, we shall look at some of the ways that Gettier-type cases have functioned as a tool for testing proposals about the nature of evidence. In §3, we shall look at some of the ways that these cases have functioned as a tool for testing proposals about the relationship between evidence and warrant (i.e., that which distinguishes mere true belief from knowledge). In §4 and §5, we shall look at challenges to some standard operating assumptions about evidence and knowledge in the post-Gettier literature.

1. Gettier-Type Cases
Gettier doesn’t spend much time discussing the difference between JTB and ETB. Few epistemologists have criticized him for failing to do so. Perhaps it is thought that this thesis about evidence and justification is true enough for Gettier’s purposes:

\[ \text{Evidentialism: A thinker is justified in believing } p \text{ iff the thinker’s evidence provides adequate support for believing } p. \]

Even if there are important differences between being justified and having adequate evidential support, the differences wouldn’t matter for Gettier’s purposes if we all agreed that his cases were cases in which a thinker didn’t know \( p \) in spite of the fact that they correctly believed \( p \) on the basis of adequate evidence.

Let’s have a look at his first case, Coins. Smith is the protagonist. He has strong evidence for believing this conjunction:

1. Jones is the man who will get the job, and Jones has ten coins in his pocket.

Smith realizes that (1) entails:

2. The man who will get the job has ten coins in his pocket.

Because Smith has strong evidence for (1), he should have strong evidence for (2). As it happens, though, Smith's evidence for (1) is misleading and it is Smith, not Jones, who will
get the job. While Smith's belief in (1) is mistaken, Smith's belief in (2) is not. Smith also happens to have ten coins in his pocket.

Smith believes (2) and (2) is true. The success of Gettier's case turns on whether Smith knows (2) and whether Smith is justified in believing it. If Smith knows (2), the case isn’t a counterexample. If Smith is not justified in believing (2) or doesn’t have adequate evidence to believe (2), the case isn’t a counterexample. Perhaps most readers would agree with Gettier that Smith doesn’t know (2), but what about the third condition in the JTB or ETB account? Does Smith have adequate evidence for believing (2)? Is Smith justified in believing (2)?

Gettier seems to assume that Smith has adequate evidence for (2) and that this means that he is justified in believing it. (Perhaps this is some weak evidence that Gettier assumes that something along the lines of Evidentialism is correct.) Some readers might want to know more about Smith’s evidence before issuing a verdict on whether the evidence or justification conditions are met, but I think we should abstract away from the details and focus on two assumptions that Gettier makes explicit. He assumes that it should be possible to meet the evidence and justification conditions even if the thinker’s evidence supported a false proposition:

Fallibilism: It is possible for a thinker to have adequate evidence for believing a proposition even if it is possible for a thinker to have just this evidence and be mistaken in her belief.¹

Most epistemologists would probably agree that this fallibilist thesis is correct. We often learn from induction. If it is possible to come to know p via inference where the evidence that supports p is fallible in the relevant sense, it should be possible for the thinker to be justified in this belief. It is plausible that a thinker is justified in believing whatever she knows.

If this shows that there is no principled objection to the idea that Smith is justified in believing (1) in spite of its falsity, it seems that we can appeal to one further assumption to get Gettier’s desired conclusion:

Closure: If a thinker is justified in believing p and she knows that q is a logical consequence of p, she is justified in believing q.

Provided that Smith is justified in believing (1) and knows that (2) is a logical consequence, we are home free. Smith is justified in believing (2) and he has adequate evidence for (2). Readers know that Closure is controversial. To the best of my knowledge, however, those who deny closure do not think that Coins is a plausible counterexample to the claim.

It should be noted that some philosophers have questioned whether Gettier’s cases were genuine counterexamples because they were concerned about the role that false propositions played in the evidential pathway that leads Smith to conclude (2). Pappas and Swain, for example, suggested, “If an essential part of the reasoning from the evidence to the accepted proposition, h, proceeds through a false step, then acceptance of h is not justified” (1978: 15). They might have thought that genuine evidence consists of true propositions and that support by genuine evidence is necessary for justification.

While I have some sympathy for this suggestion about evidence, I don’t think these concerns could do much to save the ETB account. First, some readers will have sympathy

¹ Fallibilism, as understood here, is a thesis about the adequacy of evidence. On its own, it tells us nothing about justification. How should adequacy be understood? If we combine Fallibilism with Evidentialism, adequate evidence is sufficient for justification. If we consider Fallibilism on its own, the idea is that evidence is adequate iff a belief would not fail to have justification because it lacks the right kind of evidential support.
for the idea that the operative notion of justification is connected to things like responsibility and blame, in which case it is hard to see how the truth or falsity of the operative considerations that led Smith to conclude that (2) is true could have much to do with meeting the justification condition:

To get at Gettier’s notion of justification, we might then ask, when is a person justified in believing something in such a way that Gettier’s points about justification apply? A person is justified in believing a proposition when no more can reasonably be expected of him with respect to finding out whether that proposition is true. Clearly, Gettier’s points about justification hold here: there can be cases where no more can reasonably be expected of a person as a truth-seeker with respect to some proposition, and yet the proposition be false (Lowy 1978: 106).

If this is right, then someone who wanted to press Pappas and Swain’s worries would have to challenge Closure. The intuitions that Lowy taps into in motivating Fallibilism seem to support the further claim that Gettier’s case isn’t a counterexample to Closure. If it were, we’d have to think that if we ran two versions of Gettier’s case (one in which Smith’s beliefs were all true and the case as Gettier described it) we would have adequate evidence and justification for (2) in only one version of the case. In turn, we would have to say that Smith didn’t have justification because he did not do everything that could be reasonably expected. This seems wrong, however. If Smith is internally the same in the two versions of the case, he should be equally responsible in the two cases.

Second, it seems that Gettier’s point about ETB can be made without using Gettier’s cases. We can sidestep Pappas and Swain’s worry if we formulate Gettier-type cases in which the protagonist doesn’t reason through a false step. Environmental luck cases are a good case to consider in this regard:

Fakes. I look at a display of 50 identical-looking pens. They all have blue caps, but only one of them is a blue-ink pen. I happen to look at the blue-inked pen and believe that it is a blue-ink pen. If I had looked at any other pen I would have believed the same and be mistaken (Dutant 2016: 149).

If we wouldn’t have knowledge under the conditions described, it seems that fussiness about the presence of falsehoods in the chain of supporting reasons is a distraction.

Many think that Gettier’s protagonist had beliefs that met the conditions imposed by JTB and ETB but lacked knowledge because there was too much luck involved in the connection between the subject’s belief and the truth. Environmental luck cases of the kind just described seem to show that a kind of lucky connection between belief and truth can preclude knowledge even if the relevant belief is not supported by mistaken premises. It wouldn’t seem that in the environmental luck cases, there is knowledge-precluding luck even though the relevant belief is not based on any mistaken beliefs or premises or any sort of false evidence.3

We don’t need to use cases to try to show that Gettier’s point can be generalized. Zagzebski argues that Gettier-type cases can be constructed for any view that incorporates Fallibilism:

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2 Obviously, this is a variant on Goldman’s (1976) example, inspired by Ginet. I find this telling of the case does a better job eliciting the relevant intuition.

3 It should be noted, however, that some have argued that environmental luck is not incompatible with knowledge. See Hetherington (1998) for discussion and Madison (2011) for a response.
Inescapability: A Gettier-type case can be generated for any view of knowledge according to which warrant does not entail truth.

Let us say that ‘warrant’ is a technical term that stands for whatever it is that is added to true belief to give us knowledge. If we introduce the term this way, it is trivial that any warranted true belief will be knowledge, but it will not be trivial that any warranted belief will be true. Given how the term is introduced, it could be that warrant is something that is common between, say, a true belief that constitutes knowledge and a false belief that does not. If a thinker has a warranted false belief, say, because the belief’s falsity is due to bad luck, there is nothing that would prevent the thinker from deducing something from this belief that is true owing to some stroke of good luck. This true belief, like the false one, might be true only as a matter of luck, in which case the warranted true belief would not be knowledge. Since this is impossible, the lesson to draw from this seems to be that all warranted beliefs are true.

The upshot seems to be this. If Fallibilism is correct, the truth condition is not invariably met when a belief is supported by adequate evidence. Since warrant, whatever it is, ensures that a belief is true, it should follow that a belief can be supported by adequate evidence and lack warrant. Thus, it would seem that philosophers interested in understanding warrant would want to focus their attention on the further conditions that do not supervene upon a thinker’s evidence.

Gettier-Type Cases and Theories of Evidence
A Gettier-type case typically functions as a device for testing a theory of knowledge. They have recently been pressed into service for testing theories of evidence. Some appeal to intuitions about Gettier-type cases to justify claims about what a thinker’s evidence supervenes upon. Some appeal to the possibility of Gettier-type cases to argue against certain proposals about the nature of evidence.

For a variety of reasons, some epistemologists now believe that a thinker’s evidence is just her knowledge:

\[ E=K: \text{A thinker’s evidence includes all and only what the thinker knows.} \]

Why should we think that a thinker’s evidence is just her knowledge? First, it seems that our evidence can be propositionally specified. Second, it seems that knowledge should be sufficient for the possession of evidence. Third, linguistic evidence suggests that all ascriptions of propositionally specified evidence entail corresponding knowledge claims. Because of space, I cannot attempt to defend these claims here. All I can do given the space of this essay is note that they have been defended elsewhere and observe that anyone who wishes to reject E=K would have to reject at least one of them.

Some writers have suggested that our intuitions about Gettier-type cases reveal that E=K is mistaken. If we think that adequate evidential support is not sufficient for warrant and we think that the reason that this is so is that certain kinds of harmful epistemic luck prevent a true belief that is supported by adequate evidence from being knowledge, one thing we seem to learn is that the luck that precludes knowledge does not appear to prevent a body of evidence from providing adequate support for a belief. It seems that we might have pairs of thinkers in two worlds who have all and only the same non-factive mental states, all and only the same evidence, have beliefs that are equally accurate but

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4 For defences, see Hyman (1999) and Williamson (2000).
7 See Unger (1975).
still have beliefs that differ in that one thinker has warranted beliefs and the other does not. This would seem to tell us something interesting about the supervenience bases for knowledge and evidence. Whatever it is that constitutes the supervenience base for the facts about evidence and evidential support, it doesn’t include the conditions that rule out the malignant epistemic luck that threatens knowledge. Hughes (2014) and Locke (2015) appeal to environmental luck cases (e.g., Fakes) to try to illustrate this point. As they see things, the conditions in environmental luck cases that defeat knowledge do not have much bearing on whether the fact, say, that a pen is blue causes the belief that it is or explains why the thinker believes the pen to be blue. Thus, they think that while the thinker wouldn’t know that the pen was blue, the fact that it was seems like the kind of thing that could be the thinker’s reason for believing various things about the pen. Mitova (2015) and Hofman (2014) use veritic luck cases (e.g., Coins) to make a similar point. If we think of reasons or evidence as facts, perhaps having a reason or having some evidence is just a matter of having an attitude that is correct or accurate. As long as the thinker has a true belief (and there is nothing internally amiss), the accidental connection between belief and fact that blocks knowledge in Gettier’s original cases needn’t prevent the truth from belonging to the thinker’s evidence. The guiding intuition seems to be that some of the conditions that make a Gettier-type case a Gettier-type case do not have any role to play in determining what the thinker’s evidence is, only what the thinker is in a position to know on the basis of it.

Comesaña and Kantin (2010) argued for something slightly different, which is that E=K implies that Gettier’s case wouldn’t have been a genuine counterexample to the JTB or ETB accounts. They think that E=K implies the following claim:

\[ E = K_1: \text{The proposition that } p \text{ justified } S \text{ in believing } q \]

only if S knows p.

Comesaña and Kantin suggest that E=K1 is a consequence of E=K because an important functional role that evidence is supposed to play is that of justifying belief. If a proposition justifies some belief, shouldn’t we think of it as evidence? If some such proposition can justify belief without that proposition being known, shouldn’t we have our counterexample to E=K? If we think that the answers to these questions is ‘Yes’, it looks like E=K is in trouble.

Smith comes to believe (2) by reasoning from (1). If we assume that Coins is a counterexample to JTB, we have to assume that Smith was justified in believing (2). Isn’t this some reason to think that if E=K1 is correct, (1) is part of Smith’s evidence? Since, by hypothesis, (1) is false, E=K would be mistaken if (1) is part of Smith’s evidence. If, however, (1) is not part of Smith’s evidence, how could Smith be justified in believing (2)? If (1) isn’t evidence, it doesn’t seem that Smith’s belief would be well-founded and thus wouldn’t be something that Smith would be justified in believing. Thus, Coins wouldn’t be a potential counterexample to JTB.

Someone who defends E=K might pursue a number of responses to this line of criticism. First, they might observe that Smith’s belief in (1) is supported by further beliefs. If these further beliefs are knowledge, these further beliefs might constitute Smith’s evidence and provide adequate support for both (1) and (2). Thus, little might turn on whether (1) is part of Smith’s evidence. Second, they might argue that not all justification or knowledge comes from evidence. It is one thing to say that all evidence is such that it must be capable of offering support for a thinker’s beliefs and another to say that the support that a thinker has for her beliefs must always come from the thinker’s evidence. Couldn’t those who accept E=K admit that it’s possible for something that isn’t evidence to be psychologically operative and generate a belief that has the properties that make it a good candidate for knowledge or for justification? Someone who accepts E=K might say that the mistaken belief in (1) is a cog in a process that generates a belief in (2) in such a way
that the belief in (2) turns out to be justified even though (1) isn’t part of Smith’s evidence. Someone sympathetic to E=K might argue, for example, that the correct explanation as to why Smith is justified in believing (2) is not one that assumes that Smith’s belief in (2) is supported by a piece of evidence corresponding to (1). While there are certainly some views of justification that imply that it’s not possible for a thinker to be justified in believing something without supporting evidence for that belief, a proponent of E=K might reject that proposal. They might instead say, following Bird (), that a person is justified in believing something if the thinker’s belief is knowledge or fails to be knowledge for reasons that are external to the thinker’s perspective. This account of justification seems to leave open the possibility that a thinker might justifiably believe something just because they are sufficiently similar to a thinker in a case of knowledge, not because the thinker also has good evidence that supports her belief.

As with the previous objection to E=K, this line of attack runs into the problem that linguistic evidence suggests that the case cannot show what it is intended to. The notion of a proposition that justifies a thinker in believing something is a slippery one, but if the case does what it must to cause trouble for E=K, we have to assume the following:

(3) Smith’s reason for believing that the man who got the job had ten coins in his pocket was that Jones had the coins and got the job.

Plausibly, (3) entails:

(4) Smith knew that Jones had ten coins in his pocket and that Jones got the job.

Notice that it sounds quite odd to combine (4) and (3), to assert (3) and ask whether (4), or to assert (3) and add, ‘Not only that, but (4)’. These are all evidence of an entailment from (3) to (4). We know that (4) is false, however. It’s essential to the case that Jones didn’t get the job. Thus, we might wonder whether this is a case in which a problematic proposition (i.e., (2)) justifies Smith in thinking by virtue of the fact that it’s a piece of evidence or a good reason or is a case in which (3) wouldn’t figure as part of the explanation of the fact that Smith is justified in believing (2).

We have seen some of the ways that intuitions about Gettier-type cases have been used to test proposals about the theory of evidence. It is unclear whether these objections to E=K succeed and so it is unclear how helpful these intuitions might be for testing theories of evidence.

Evidence and Warrant

Let’s suppose that Gettier’s cases did what they were intended to do. If they did, they show us that facts about what a thinker knows at a given time do not supervene upon facts about the thinker’s beliefs, the accuracy of these beliefs, and the evidence that the thinker has that supports them. The cases leave intact the idea that a thinker’s evidence determines whether the thinker is justified in believing what she does and suggest that any further inquiry into the conditions that matter for knowledge should focus on factors beyond those that matter to evidence and/or justification. Thus, the evidence or justification condition must be supplemented or replaced.

We see this in many of the main proposed accounts of propositional knowledge in the post-Gettier literature:

- Defeasibility theory: Knowledge requires the absence of defeaters (i.e., truths that, if the thinker were aware of them, would defeat the thinker’s justification) (Lehrer and Paxson (1969)).
• Causal theory: Knowledge requires an appropriate causal relation between the thinker's belief and that which makes it true (Goldman (1967)).
• Sensitivity theory: Knowledge requires a belief formed in such a way that if it had been false, the thinker would not have held it (Dretske (1971), Nozick (1981), and Roush (2006)).
• Safety theory: Knowledge a belief formed in such a way that the belief could not have easily been formed that way and been false (Luper-Foy (1984), Sosa (1999), and Williamson (2000)).

Most of these authors were happy to say that the crucial conditions we would need to address the Gettier problem had little if anything to do with the makeup of the thinker's evidence or with the kinds of support it provided for a thinker's beliefs. They seem to grant that even if a thinker had evidence that we would all agree would provide adequate support for her beliefs, some further conditions could prevent a true belief from being knowledge without having any bearing on whether the thinker was justified in her belief.

Consider, for example, the causal theory of knowledge. On this theory, the presence or absence of the right kind of causal connection between a thinker’s belief and that which makes the thinker’s belief true does not supervene upon this thinker’s evidence (Goldman 1967: 341). A proponent of this view might, for example, take the thinker’s evidence to be something that supervenes upon the thinker’s non-factive mental states. The facts about the relevant causal relations would not supervene upon these mental states, not when the thinker’s beliefs were about states of the external world. Consider, also, Adler (2002) and Dretske’s (1971) suggestion that knowledge requires conclusive reasons. On their view, a thinker has conclusive reasons or evidence for her belief only if that belief is true, but he is clear that the possession of such reasons or evidence is not necessary for justification and that it is typically a contingent fact about conclusive reasons that they are conclusive. On this view, the reasons that a thinker has in a case of ordinary knowledge would be conclusive but it is possible for a thinker to have the very same reasons and fail to have reasons that provided conclusive support for their beliefs. As a vivid illustration of this, think about the fake barn examples or cases of environmental luck more generally.

While many epistemologists are happy with a hybrid view on which the factors that matter to justification are, at most, a proper subset of those that matter for knowledge, this view has recently come in for criticism. We shall look at McDowell’s critical discussion of the hybrid view in the next section before turning to a discussion of Williamson’s knowledge-first account of evidence.

**McDowell and the Hybrid View**

We will look at two challenges to the view that there is no constitutive connection between a subject's evidence and her knowledge. The first comes from McDowell. McDowell thinks that knowledge is a standing in the space of reasons (1998: 395). It looks like he means this in two ways. First, he thinks that knowledge is supported by reasons. We acquire knowledge by responding appropriately to the reasons in our possession. As we shall see, he defends a robust reading of this claim. Second, he thinks that knowledge is a standing or a normative status, one that we must attain if our beliefs are to be justified. If a thinker believes $p$ but fails to know $p$, their belief about $p$ is not justified and they have failed to meet the normative requirement that a thinker believe only on the basis of adequate reason. The adequacy of evidence, on his view, turns on whether the evidence ensures that the thinker is in a position to know $p$. 
Let's consider these two points in turn. Many philosophers would agree that we come to know things by responding correctly to the reasons we have for our beliefs. It happens, most would say, when we have good reasons for our beliefs and further factors obtain that ensure that our beliefs are correct and that we aren't in a Gettier-type case. McDowell defends a much more interesting claim than this. He thinks that a state could not be a state of knowledge unless the reasons that supported it provided us with everything required for knowledge. He explicitly rejects the prevailing view that allows that it is possible to have the kind of evidence necessary for knowledge without also having a belief that is true:

In the hybrid conception [of knowledge], a satisfactory standing in the space of reasons is only part of what knowledge is; truth is an extra requirement. So two subjects can be alike in respect of their satisfactoriness of their standing in the space of reasons, because only in her case is what she takes to be actually so. But if its being so is external to her operations in the space of reasons, how can it not be outside the reach of her rational powers? And if it is outside the reach of her rational powers, how can its being so be the crucial element in the intelligible conception of her knowing that it is so (1998: 403)?

What is wrong with the prevailing view, the view that says that the evidence that we have in cases of knowledge could provide the same support for false beliefs or beliefs that fail to constitute knowledge for some other reason? Perhaps this passage captures McDowell's worries about the intelligibility of the hybrid view:

... [O]ne's epistemic standing ... cannot intelligibly be constituted, even in part, by matters blankly external to how it is with one subjectively. For how could such matters be other than beyond one's ken? And how could matters beyond one's ken many any difference to one's epistemic standing (1998: 390)?

On the hybrid view, matters 'blankly external' to how things are from the subject's point of view turn out to be the crucial difference-making factors that explain why pairs of subjects who have the very same perspectives, the very same reasons, the very same evidence differ in terms of what they know. This seems to conflict with the idea that when we credit someone with knowledge, we say that the relevant fact that they know is not beyond their ken, something that is within the reach of their rational powers, or something that they are aware of. On the hybrid view, a complete and accurate description of the subject's perspective on the world and the exercise of their rational powers would just be neutral on whether the subject was in touch with things as they actually were. How can we say both that a subject is in touch with the relevant realities and say that their rational capacities put them in touch only with appearances?

Relatedly, think about McDowell's suggestion that knowledge is itself a normative standing. Suppose you should not believe what you do not know. Suppose further that whenever you believe with justification it is false that you should not believe what you do. If we combine these two normative claims with the assumption that you have justification to believe what you have adequate evidence to believe, we have our argument against the hybrid view of knowledge. It would be impossible for a thinker to have adequate evidence to believe $p$ and be mistaken in believing $p$.

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8 For an incredibly useful guide to McDowell's conception of knowledge, see van Cleve (2004).
If McDowell is right to reject the hybrid view, these three claims about knowledge should be correct:

Non-Doxastic Possession: A thinker knows \( p \) only if the thinker independently possesses adequate evidence for this belief.
Normative Adequacy: A thinker knows \( p \) only if the thinker's evidence ensures that she conforms to the epistemic norms that govern belief.
The Knowledge Norm: A thinker should not believe \( p \) unless they know that \( p \).

While many epistemologists might accept the first two theses, few would accept all three. In combination, they imply that a thinker cannot know or justifiably believe \( p \) unless the thinker possesses reasons independently that ensure that the thinker is in a position to know \( p \). Since we cannot be in a position to know what isn't so and aren't in a position to know in Gettier-type cases, McDowell's view implies that knowledge and justification require the presence of supporting reasons that entail both the correctness of our beliefs and the absence of knowledge-undermining luck.

Let's briefly consider three potential problems for McDowell's position. First, there problems associated with his handling of cases of non-inferential perceptual knowledge. If we want to understand how perceptual knowledge is possible on this picture, it looks like we will have to embrace a controversial account of perceptual experience on which experience involves both relational and representational elements. The experience would need to be understood relationally because McDowell thinks that the justification of perceptual belief turns on whether the thinker is in a position to know that this belief is correct and thinks that this epistemic property has to supervene upon the thinker's experience. (If it did not, we would be left with a version of the hybrid view.) If the thinker's experience were not a relation between the thinker and aspects of the external word of which she would be aware in having the experience, the relevant epistemic property would not supervene upon the thinker's experience. The view also requires a representational view of experience because it requires that there's some logical relation between that which perception provides us and the beliefs we form in response to it.\(^9\) If experience had no representational content, no such logical relations could hold between the perception and the beliefs we form by taking experience at face value and McDowell fears that this would mean that perception provides causes for our beliefs without providing reasons.\(^10\)

Some of McDowell's critics have argued that this picture of experience is untenable. First, McDowell's view commits him to a disjunctive conception of experience because a view that identifies a subject's experience with the highest common factor between perception and hallucination cannot identify the subject's experience with a perceptual relation between the thinker and things in an external reality. Some have objected on empirical grounds to McDowell's metaphysical disjunctivism.\(^11\) Second, there are those who object that McDowell's particular brand of disjunctivism is problematic precisely because of how it tries to incorporate representationalist and relationalist elements. On the one hand, if the objects of visual awareness were particulars (e.g.,

\(^9\) For an important defense of the idea that experience has representational content, see Siegel (2010).
\(^10\) For helpful discussions about whether perceptual beliefs are based on reasons, see Ginsborg (2006) and McGinn (2012) for defences of two very different approaches.
substances and events), it is hard to see how awareness of them alone (i.e., without the aid of something representational) could provide us with reasons that would guarantee that our perceptual beliefs formed under ideal circumstances would be knowledge. On the other, it is hard to see how perceptual awareness could be anything but awareness of particulars found in our surroundings. To explain how such awareness could be the source of knowledge, McDowell faces the non-trivial problems of having to show that experience has a representational aspect and that this further representational aspect of experience could ensure that we had facts in our possession that would provide an adequate basis for perceptual belief. He sees the need to reject the idea that the understanding operates on that which the senses independently bring into view, but it is unclear how the understanding could play any other role than this in the processes that precede perceptual judgment.

The second problem is that of squaring McDowell’s view with an optimistic assessment of the scope of our inferential knowledge. While deductive reasoning from things that are certain might pose no problem for his view, the case of inductive inference poses an obvious challenge. On McDowell’s view, it wouldn’t be possible for a thinker to be in a position to know \( p \) via inference unless they possessed reasons for believing \( p \) that would ensure that any thinker who had just these reasons would likewise be in a position to know \( p \). Thus, it would seem that inference from observed to unobserved cases should not be expected to yield knowledge since a natural description of this inference is from a set of premises to a conclusion where the conclusion’s falsity is compatible with the truth of all the premises.\(^\text{12}\)

Third, there is a local problem posed by certain Gettier-type cases involving environmental luck. McDowell thinks that when we have perceptual knowledge, the reasons that supported this belief were reasons that we had by virtue of the perceptual relations we stand in. Consider an ordinary case of perceptual knowledge and then a similar case in which environmental luck seems to preclude our having this perceptual knowledge (e.g., Fakes). Do we really think that by virtue of the fact that these two thinkers are in a position to know different things, these thinkers stand in different perceptual relations to things in their surroundings? I think it is implausible to say that the subject in Fakes stands in different perceptual relations than he would have if all the fakes had been replaced by the real article.\(^\text{13}\) It is hard to believe that the facts about the perceptual relations we stand in supervene upon, say, the presence or absence of fakes, particularly unobserved ones that would seem to rob us of knowledge.

If these problems are as serious as I take them to be, there is no non-skeptical view on which knowledge is a standing in the space of reasons in the two ways described above. We could embrace Evidentialism, we could take knowledge to be the norm of belief, but we could not combine both ideas in some single non-skeptical account of knowledge.

**Williamson’s Hypothesis**
The difficulties for McDowell arise because he combines Evidentialism with Normative Adequacy and the Knowledge Norm. If the arguments for E=K have the force I take them to, we can use these arguments to attack Evidentialism. Once we abandon that picture of the relationship between knowledge and evidence, the problems discussed in the previous section are dissolved.

To see why E=K is in tension with Evidentialism, think about the case of non-inferential knowledge. If a thinker comes to know \( p \), say, as a result of seeing how things stand in her surroundings, Evidentialism tells us that the thinker could justifiably add her

\(^{12}\) For a helpful critical discussion, see Comesana (2005).

\(^{13}\) See Schellenberg (forthcoming) for a helpful discussion of these issues.
belief in $p$ to her set of beliefs only if she independently possessed evidence that provided adequate support for that belief. On the assumption that the thinker’s evidence just is her knowledge, we should expect this condition to be routinely violated in cases of non-inferential knowledge. Of course, those who like Evidentialism will say that the fact that we need knowledge to possess evidence points to a serious problem with $E=K$—it implies that in cases of non-inferential knowledge our beliefs would routinely be formed without being based on evidence!

One way to test which approach has the upper hand here is to recall two of the considerations offered in support of $E=K$. Anyone who accepts rejects $E=K$ on the grounds that many of our non-inferential beliefs were not supported by evidence at the point of their formation has to decide whether they think that evidence is propositional and whether they agree that ascriptions of propositionally specified evidence entail knowledge ascriptions. If such ascriptions of evidence do indeed entail knowledge ascriptions, this is some evidence that the Non-Doxastic Possession Thesis is false. In turn, it suggests that the process that yields non-inferential knowledge is not one that takes propositionally specified evidence as input and yields belief as output. If all evidence is indeed propositionally specified, it means that cases of non-inferential knowledge are cases that show Evidentialism to be mistaken.

One virtue of $E=K$ is that it shows that there is a false choice between Fallibilism and McDowell’s brand on infallibilism on which it’s only possible for a thinker to be in a position to know $p$ if she has entailing evidence for that belief. A trivial consequence of $E=K$ is that in every case of knowledge, a thinker has entailing evidence for her belief as a consequence of coming to have that knowledge. Thus, the view vindicates McDowell’s idea that there had better be something accessible to the subject ‘in the know’ that distinguishes her situation from the situation of a subjectively similar subject in a bad case. There is. It is the fact that the thinker knows. It is accessible to the thinker who knows (as a consequence of knowing) but not to the thinker in a bad case. If we reject Evidentialism, we reject the idea that by virtue of accepting this kind of infallibilism we need independently possessed entailing evidence for knowledge. Thus, we avoid some of the awkward things that McDowell has to say in discussing inductive inference.

Of course, not everyone is happy with the consequence that this approach implies that it is only possible for a thinker to have knowledge of $p$ if the probability of $p$ on the thinker’s total evidence is 1. Brown (2013), for example, thinks that this implication of Williamson’s view is problematic because Williamson’s view avoids sceptical problems only because his view implies that the things we know will be evidence for themselves. It is unclear how serious this problem is, however, for $E=K$, however, as this is a feature of many views that accept a probability raising conception of evidence. (If we abandon that picture of evidential support, it isn’t clear whether there is any remaining problem for $E=K$.)

Once we embrace the idea that acquiring knowledge is how we acquire evidence and abandon the idea that the acquisition of evidence is an independent process and one that must be completed successfully first in order to put a thinker in a position to know, we might then wonder again about the possibility of Gettier-type cases. Many epistemologists think that there are Gettier-type cases only if it’s possible for there to be a belief that is both justified and true that fails to constitute knowledge. How could Williamson accommodate this?

He might not be able to. Suppose that at noon, Tim comes to know that $p$ inferentially. Suppose that by dinner time, he has forgotten all the supporting considerations that backed this belief but retains his knowledge of $p$. It would seem that he would still be able to come to know the obvious consequences of $p$ by means of competent deduction and that such beliefs would be based on good evidence or good
reasons. It doesn’t seem that Tim’s reason for believing $q$ (one of $p$’s obvious consequences) could have been the reasons that convinced him initially that $p$ was true. Tim’s reasons would have to be the considerations in light of which he came to believe $q$ and that would not include the things that he had forgotten long before he considered whether $q$. It seems that the only good candidate to play the role of Tim’s reason for believing $q$ would be that $p$. This is some reason to think that possessed knowledge should be sufficient for evidence even if that knowledge was acquired via inference.

Now, consider two claims about justification and evidence. First, if a thinker’s belief is justified, it can be justifiably included in theoretical reasoning. This seems plausible if you think that the right to believe comes with further rights, such as the right to treat what’s believed as a premise in reasoning. (Think about the contrapositive—would it make sense to say that someone lacked sufficient epistemic standing to treat $p$ as a reason but shouldn’t abandon their belief in $p$?) Second, a thinker’s belief can only be justifiably included in theoretical reasoning if it provides the thinker with evidence or a reason that could serve as the basis for some concluding belief. If we add these two claims to the mix, we get the result that no belief could be justified unless its content was known by the thinker to be true.¹⁴ We lose the distinction between justified belief and propositional knowledge. If the possibility of Gettier-type cases requires a possible distinction between justified belief and propositional knowledge, we have an argument from E=K and some plausible ancillary considerations to the surprising conclusion that knowledge just is justified belief.¹⁵

There might still be room for some Gettier-type cases. Recall Lowy’s point from above that it is important to distinguish the justification of belief from the justification of some believer. It might be that these points about justification and evidence are plausible only if they pertain to doxastic justification rather than personal justification.

If readers aren’t happy with that distinction and agree that a natural consequence of E=K (combined with the ancillary assumptions mentioned above) is that there cannot be justified beliefs that are not knowledge, we might now ask what this means for the ETB or JTB accounts. Did they survive Gettier’s attack? Perhaps not. There is nothing in this that should be taken to support the idea that a state of belief is knowledge because it is supported by adequate evidence or because the belief is justified and true. We might say that the belief is justified because it is knowledge or that it does not lack adequate evidential support because it is knowledge. Gettier can still be credited with helping us see that these are bad accounts of what makes something knowledge.

References

¹⁴ This argument draws on some ideas of Bird (2004) and is developed in detail in Littlejohn (2012) where I argue that a factive account of doxastic justification is a consequence of the idea that reasons themselves are always facts. For a defense of that approach to the ontology of reasons, see Alvarez (2010).

¹⁵ Sutton (2007) defends this view, albeit on very different grounds. Although Williamson (2000) initially suggested that he thought that there could be false beliefs that were justified, he has come around to the idea that a fully justified belief must itself be knowledge. McDowell (1998) likewise holds that all justified beliefs are knowledge, but differs from these authors in insisting that all such beliefs are turned into knowledge because of the incredible support the thinker’s reasons provides for such beliefs.
