Article

Smith's Ambiguous Descriptions: A Reply to Jose and Mabaquiao

Nikhil Santwani, Vincent Ferdinand Co, and Mark Anthony Dacela

Abstract: In "Resolving the Gettier Problem in the Smith Case: The Donnellan Linguistic Approach," Jose and Mabaquiao argue that Gettier's Smith case does not work as a counterexample to the Justified True Belief (JTB) account of knowledge, since it does not satisfy the truth condition. Their claim hinges on what seems to be a gap between logic and natural language that is exemplified in the case, maintaining that the definite description in "the man who will get the job" is used by Smith referentially and not attributively. We respond to Jose and Mabaquiao in two ways. First, we demonstrate that the exclusive treatment of definite descriptions as having either referential or attributive use does not apply to all cases, especially if they are ambiguous, like in Case I. Using Kripke's theory of references instead, we show that the proposition in question is still true semantically and not false. Second, we demonstrate that the same analysis does not work in Gettier's second example and other Gettier-type cases even if we were to grant the validity of Donnellan's theory, despite its problems. We do this to show that even if their analysis holds for the Smith case, it is not a viable solution to the Gettier problem.

Keywords: Donnellan, Kripke, Gettier problem, definite descriptions

In their article "Resolving the Gettier Problem in the Smith Case: The Donnellan Linguistic Approach," Jose and Mabaquiao claim that Gettier has misused and exploited the classical rules of logic, inappropriately misapplying it to the ordinary discourse of natural language. They argue that

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¹ Joseph Jose and Napoleon Mabaquiao, Jr., "Resolving the Gettier Problem in the Smith Case: The Donnellan Linguistic Approach," in *Kritike*, 12: 2 (December 2018), 116, https://doi.org/10.25138/12.2.a7.

Gettier's Smith case does not work as a counterexample to the Justified True Belief (JTB) definition of knowledge since it fails to satisfy the truth condition. Their analysis extends Donnellan's theory of definite descriptions,² which treats definite descriptions as strictly being either referential or attributive. They maintain that the definite description "the man who will get the job" is used by Smith referentially and not attributively, which implies that he particularly has Jones in mind and not anyone else, making the proposition false when Smith got the job.

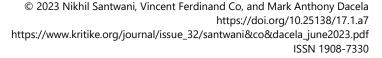
We respond to their argument in two ways: (1) Following Kripke's two-level theory of semantic and speaker reference, we demonstrate that the mutual exclusivity inherent in Donnellan's theory of definite descriptions as either being *referential* or *attributive* does not apply to Gettier cases in which the descriptions are ambiguous. (2) We posit that even if the analysis works for Case I, the same analysis does not apply to Gettier's second case, other cases of Gettier problems, and a modified version of Case I itself. This shows that assuming the argument does hold for Case 1, it does not solve the Gettier problem.

In the first section we discuss Jose and Mabaquiao's argument. In the second section, we present the problems in Donnellan's theory of definite descriptions and offer Kripke's theory of references as an alternative framework for linguistically analyzing Gettier-type cases. Finally, in the third section we show that even if Donnellan's framework is correct, it still fails to resolve other Gettier-type cases and a modified version of Case I.

Jose and Mabaquiao's Attempt to Resolve Case I of the Gettier Problem

Jose and Mabaquiao first argue that the Gettier problem, specifically Case I, is problematic in itself because it exploits the principles of logic to argue for cases which do not happen in everyday life.³ They further argue that situations such as the Gettier problem are not how epistemic situations work in daily life, meaning that these logical rules are not grounds for judging truth in everyday discourse. This was exemplified through the exploitation of logical rules such as *Deductive Closure, Principle of Existential Generalization*, and the *Principle of Disjunction Introduction*.⁴ Using these principles ignore context, state of mind, and other extralocutionary factors which are important in making sense of Gettier problems and general epistemic situations. This

⁴ Ibid., 113.





² Keith Donnellan, "Reference and Definite Description," in *The Philosophical Review*, 75: 3 (July 1966), 281–304, https://doi.org/10.2307/2183143.

³ Jose and Mabaquiao, "Resolving the Gettier Problem in the Smith Case," 116–119.

leads to epistemologists overlooking the distinction between the approaches of natural language logic in approaching truth.

From this, they narrate the linguistic approach to the Gettier problem, in particular, that of Yussif Yakubu which claims that the most promising linguistic approach to the Gettier problem is that of Kripke's distinction between semantic reference and speaker reference and Donnellan's distinction between the referential and attributive use of definite descriptions.⁵ Derived from this, what is problematic with the Gettier challenge using Donnellan's framework is the specific proposition "the man who will get the job has 10 coins in his pocket." This is because Smith uses this referentially with Jones in mind, while Gettier uses this in the attributive sense, that is, whoever specifically fits the description as specified by the definite description. This misappropriation is where the objection of Jose and Mabaquiao proceeds.⁶

The argument then progresses to using Donnellan's framework against the Gettier challenge as this is more appropriate in discussing the problem as opposed to Kripke as his framework leads to ambiguity. They then summarize Donnellan's framework which we shall echo here for the sake of completeness. Donnellan argues that there are two primary functions of definite descriptions: (1) attributive use and (2) referential use. To employ definite descriptions in attributive use would be to state something about anything that fits the description; to employ definite descriptions with referential use is to state something about a specific subject (e.g., thing, person, entity, etc.) and only that specific subject. It follows that the attributive use of "the man who will get the job" would be to call out anyone—or any man in our case—that satisfies the condition "the man who will get the job"; its referential use would be to call out Jones and only Jones, nothing else applies.⁷

The authors then exhibit that in Smith's epistemic circumstance, he was thinking and referring to Jones and only Jones when he uttered "the man who will get the job" for the reason that he was justified in believing that Jones will get the job, not himself or anyone else. Hence, to classify "the man who will get the job" as a definite description in its attributive use, as what Gettier did, is problematic. They argue that in Case I, the definite description that Smith proclaims employs its referential use rather than its attributive use. To correct this is to employ referential use instead. Applying this changes the meaning of the utterance to "Jones got the job and has ten coins in his pocket." This is false as it is Smith who got the job and not Jones. According to the

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⁵ *Ibid.*, 115.

⁶ Ibid., 116.

⁷ Ibid. 119–123.

authors this proves that Case I is not an instance of a true belief but a false one, meaning that this case no longer holds as a challenge to the definition of the JTB as knowledge.⁸

Donnellan's Definite Descriptions and Kripke's References

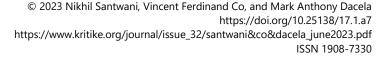
Issues within Donnellan's Theory

Jose and Mabaquiao use Donnellan's theory of definite descriptions as a framework in their attempt to prove that proposition (e), "the man who will get the job has ten coins in his pocket," in Case I is false. However, Donnellan's theory itself does hold some issues of presenting a false dichotomy and mutual exclusivity. In Donnellan's theory, definite descriptions may either be referential or attributive, but they cannot be both at the same time. These issues become problematic especially when we try to linguistically analyze ambiguous propositions such as (e) where their meaning is conflated.

If we were to observe other theories of linguistic and propositional truth, such as that advanced by Saul Kripke, we see that they offer two-level theories of truth determination which do not make use of mutual exclusivity.¹⁰ Theories of the determination of truth become two-level when they permit differences in truth value depending on the interpretation of a proposition. For example, a proposition may be true in this case, while it may also be interpreted as false. One-level theories, meanwhile, are absolute: a proposition must adhere to one truth value only, regardless of whether the focus is on context, interpretation, semantics, etc. Two-level theories of truth determination allow for the consideration of propositions that are rather ambiguous in terms of their meaning (i.e., what the proposition means is confusing and debatable). One-level theories fail to take this ambiguity into account. In this sense, Donnellan's theory of definite description is one-level because propositions (i.e., definite descriptions) may only either be referential or attributive where its truth value is contingent on.¹¹ Furthermore, other theories of truth determination are not limited to definite descriptions, unlike Donnellan's theory, but are open to any part of a proposition.

Kripke suggests that two-level theories of truth values in language allow for the possibility of different meanings for uncertain cases.¹² We

¹² Ibid.





⁸ Ibid., 122-124.

⁹ Ibid., 119-123.

¹⁰ See Saul Kripke, "Speaker's Reference and Semantic Reference," in *Midwest Studies in Philosophy*, 2: 1 (1977), 255–276, https://doi.org/10.1111/j.1475-4975.1977.tb00045.x.

¹¹ *Ibid.*, 255–257.

contend that Case I belongs to such uncertain cases as proposition (e) is challenged. For example, in Case I, when Smith utters (e), there is still truth in what he said even if it was Smith himself—not Jones—who got the job because Smith, the man who got the job, did have ten coins in his pocket. Moreover, it is also false in the sense that it was not Jones who got the job. It becomes clear here that the meaning, or perhaps *meanings* of the proposition, is ambiguous. Two-level theories uphold the truth value of what was literally said without dismissing the truth value of what was intended or vice-versa.¹³

The possibility of two-level theories, and thus ambiguous cases, may be questionable. However, our intuition for truth claims may prove their veracity. ¹⁴ Take for example Case I: we intuitively become hesitant regarding its truth value, more so if linguistic analysis is applied. Two-level theories allow us to properly understand and comprehend propositions that are ambiguous in meaning where they can both be true and false simultaneously. This is evidently the case for Case I: what Smith literally said was true but what he intended to say was false.

To solve the issues of mutual exclusivity in Donnellan's theory, Kripke suggested that ambiguous propositions may be *both* referential and attributive at the same time. This is an improvement of Donnellan's theory as it allows for the framework to apply in other Gettier-type cases. So, if we were to analyze Case I using this modified version of Donnellan's theory, then (e) will be both true and false. We should note here that Jose and Mabaquiao suggest that Kripke's modification to Donnellan's theory does not apply to Gettier cases, including Case I. However, to support this they cited Yussif Yakubu who also did not provide any specific motivation as to why this is the case. We argue then that there is a lack of reasonable grounds to exclude Gettier cases to Kripke's modification. From this, we suggest that Kripke is a better alternative to Donnellan for a linguistic analysis of the Gettier problem.

Kripke's Theory of References as an Alternative

Instead of using Donnellan's theory of definite descriptions, Kripke's theory of references may prove as a successful alternative, especially because it is a two-level theory. Kripke posits that propositions have two references: (1) semantic reference and (2) speaker reference. Note that all propositions

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¹³ Stephen Neale, *Descriptions* (Cambridge: MIT Press Books, 1990), 91–93.

¹⁴ Ibid.

¹⁵ Kripke, "Speaker Reference and Semantic Reference," 256.

¹⁶ Yussif Yakubu, "A Truth Analysis of the Gettier Argument," in *Metaphilosophy*, 47: 3 (2016), 449–466, https://www.jstor.org/stable/26602371.

have these references, unlike Donnellan's theory where descriptions can only be either referential or attributive. Kripke's theory reflects how distinctions between propositions and their meanings may be non-exclusive and may permit ambiguity.¹⁷

Kripke's speaker reference refers to the *actual* or *referred* meaning of the proposition. In other words, the speaker reference is what the speaker intended to communicate. Meanwhile, the semantic reference refers to the *implied* meaning of the proposition. It is what was actually said or what the structure, form, and semantics of the proposition are. The distinction between speaker reference and semantic reference allows for interpretation and analysis based on context and whether it is the speaker or audience interpreting the proposition. The semantic reference is what the audience hears and what the proposition means to the audience, while the speaker reference is what the speaker means and what the proposition means to the speaker.

Applying Kripke's theory of references to Case I will solve Jose and Mabaquiao's issues with its truth value. In Case I, the speaker reference of (e) is "the man, which is Jones and only Jones, who will get the job has ten coins in his pocket." Its semantic reference, meanwhile, will be what the proposition is in its form: "the man who will get the job has ten coins in his pocket." It follows that the semantic reference of (e) is true because the man who did get the job, Smith, did have ten coins in his pocket. Meanwhile, its speaker reference is false because it was Smith who got the job, not Jones. This then begs the question of whether it is the speaker reference or the semantic reference that determines the proposition's truth value.

Note that Kripke's theory implies that all propositions have both a semantic reference and a speaker reference, which may have different truth values. This is what makes Kripke's theory a two-level theory of truth. The truth value of the semantic reference (i.e., true) still holds without disregarding the truth value of the speaker reference (i.e., false). This makes sense if we consider the speaker-audience perspective. What Smith said might have been false in terms of what he intended to say but the proposition will still be true for the audience or anyone who heard Smith utter the proposition. With reference to its semantic reference, (e) is still true. Therefore, (e) is still a valid example of a justified true belief and still serves as a counterexample for the traditional account of knowledge. For the proposition to be false, both its speaker and semantic references must be false, which is not the case for (e).

¹⁷ Kripke, "Speaker Reference and Semantic Reference," 257–264.

¹⁸ Neale, Descriptions, 91–93.

Donnellan's theory of definite descriptions, in contrast to Kripke's theory, is a one-level theory. Proposition (e) will always be referentially used and thus will always be false, leaving no room for interpretation.¹⁹ Kripke's theory of references and two-level theories in general are an improvement over Donnellan's theory and one-level theories because propositions are interpreted based on both the context in which it is said and the content of the proposition itself, both of which determine the truth value of the proposition. Again, with regard to the content of (e), which is its semantic reference, the proposition is still true. Its semantics, grammar, and structure are still true because the man who got the job, regardless of which man that may be, did have ten coins in his pocket. This is especially true for cases wherein the truth value of a proposition relies heavily on interpretation based on context and semantics simultaneously.²⁰ Donnellan's theory fails to put this semantic interpretation into account. Given that we have argued for the use of Kripke over Donnellan, we posit that the exclusion of Kripke for linguistic analysis is unjustified.

Why Use Kripke in Analyzing Gettier Cases

Jose and Mabaquiao cite Mizhari's argument²¹ to justify their use of Donnellan's theory. Mizhari's argument to dismiss Kripke's theory has some issues. Mizhari argues that using Kripke's theory of references poses a difficulty in choosing whether to use the speaker reference or the semantic reference.²² Again, the choice need not be made. The point of Kripke's theory of references is that it is a two-level theory that permits ambiguity for truth values, especially for propositions with unclear meanings.²³ Jose and Mabaquiao seem to fail to take this into account in their use of Donnellan's theory.

Jose and Mabaquiao also contend that Kripke's theory of references is parallel to Donnellan's theory of definite descriptions.²⁴ They claim that Kripke's speaker reference is parallel to Donnellan's referential use, while the semantic reference is equivalent to the attributive use. They seem to imply that since the two theories are parallel, the weight of choosing one over the other is diminished. However, as our analysis of Case I using Kripke's theory

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¹⁹ Donnellan, "Reference and Definite Description."

²⁰ Jennifer Hornsby, "Singular Terms in Contexts of Propositional Attitude," in *Mind*, 86: 341 (1977), 31–48, https://www.jstor.org/stable/2253582.

²¹ Moti Mizhari, "Why Gettier Cases are Misleading," in *Logos and Episteme*, 7: 1 (2016), 31–44, https://doi.org/10.5840/logos-episteme20167111.

²² Ibid.

²³ Kripke, "Speaker Reference and Semantic Reference," 257–264.

²⁴ Jose and Mabaquiao, "Resolving the Gettier Problem in the Smith Case," 121–124.

shows, this is not necessarily true. Kripke's theory of references and Donnellan's theory of descriptions will not always necessarily be parallel with one another in all cases, even in the interpretation of other Gettier-type cases. We disagree with Jose and Mabaquiao's claim on the parallelism of the two theories as it undermines Kripke's formulation of his theory of references as a two-level theory, compared to Donnellan's one-level theory.

We advance using Kripke's theory of references as the appropriate framework for linguistically analyzing Case I and other Gettier cases, as opposed to Jose and Mabaquiao's choice for Donnellan's theory. As a two-level theory, using Kripke's theory of references allows for ambiguity in truth value for propositions with ambiguous and unclear meanings, where a semantic reference can be true while its equivalent speaker reference is false. This allows for interpretations that are contingent on content, context, and whether it is through the lens of the speaker or the audience that the interpretation is done.²⁵

We have demonstrated that (1) Donnellan's theory of definite descriptions has some issues within it regarding mutual exclusivity and (2) Kripke's theory of references pose as a viable alternative that solves the issues within Donnellan's theory. This motivates our suggestion that Kripke's theory is more appropriate to use in analyzing Gettier cases. But even if we were to admit the use of Donnellan's theory as an appropriate framework for Gettier cases, we argue that the analysis still has some issues with regard to applying the theory to *other* Gettier cases.

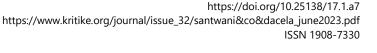
Resolving All Gettier Cases

Suppose we grant that the use of Donnellan's framework is warranted. Jose and Mabaquiao frame their linguistic analysis specifically to Gettier's Case I, ²⁶ not extending the analysis to other Gettier cases. While this limited analysis certainly has merits, it seems relevant to demonstrate that the same analysis does not hold for Case II and other Gettier-type cases.

Donnellan's theory always requires a definite description. To analyze Case II using Donnellan's theory, we must first identify what the definite description is in the proposition.²⁷ This first step, however, is problematic because there are no definite descriptions present in the propositions concerned in Case II. From here we encounter problems in trying to identify whether the sentence is used attributively or referentially because there are no definite descriptions, only proper names. Therefore, Donnellan's theory

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²⁷ Donnellan, "Reference and Definite Descriptions," 281–290.





²⁵ Hornsby, "Singular Terms in Contexts of Propositional Attitude," 31–40.

²⁶ Jose and Mabaquiao, "Resolving the Gettier Problem in the Smith Case," 113.

does not work or is an inappropriate framework to analyze Case II and other Gettier cases without definite descriptions.

The use of Donnellan's theory to disprove the veracity of Gettier propositions only works for *some* Gettier cases, not all. To demonstrate how it fails to work for other Gettier-type cases, we can try to apply the same analysis to a modified version of another Gettier case developed by Carl Ginet: the fake barn Gettier case.²⁸ Suppose that Henry was driving through a small town in Pennsylvania where there is an abundance of barns. The twist, however, is that there are both real barns and fake barns that look like real barns. Suppose that Henry passes by a strip of real and fake barns and — thinking that they are real barns based on mere observation—claims that "There is a real barn in this small town in Pennsylvania." Unbeknownst to Henry, there is a real barn beside that fake barn he thought was a real barn.

From the perspective of Gettier, Smith has a justified true belief that a real barn exists but fails to know such a thing. Let us attempt to analyze the fake barn case using Donnellan's theory of definite descriptions. The subject of experience is Smith while the object is the barn. In the proposition "There is a real barn in this small town of Pennsylvania," we first have to identify whether the "barn" is used referentially or attributively. However, it is impossible to determine with certainty whether Smith uses the proposition and experiences the case either referentially or attributively. The condition that Smith passes through a strip of real and fake barns adds to this difficulty. To ascribe either use indefinitely will rely merely on assumptions about the case and will simply result in an arbitrary designation. In this case, even in Gettier cases without proper names, the use of Donnellan still does work.

Another Gettier-type case to consider is the "sheep in the field" example by Alvin Goldman.²⁹ Imagine that Smith is in a field on the top of a small hill and sees a sheep in the middle of the field. He then forms the belief that there is a sheep in the field. Unbeknownst to Smith, what he actually saw was a dog, but also that there were other sheep roaming around the field. We can also substitute the sheep and a dog with their pluralities: a flock of sheep and a group of dogs. In this case, Smith has a justified true belief that a sheep or flocks of sheep exist in the field but he fails to have knowledge of such. Using the linguistic theory of Donnellan to analyze the case, it is much more difficult to ascribe whether what Smith refers to is referential or attributive. He may have formed the belief that a sheep or flocks of sheep exist in the field without specifically referring to the specific object that he saw. It does not contain the same intuitiveness in Case I where it is easy to ascribe that Smith

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²⁸ Alvin Goldman, "Discrimination and Perceptual Knowledge," in *The Journal of Philosophy*, 73: 20 (November 1976), 771–791, https://doi.org/10.2307/2025679>.
²⁹ Ibid.

was referring to Jones specifically. There is also no sufficient evidence that Smith forms his belief attributively and doing so is only an arbitrary move. Hence, Donnellan's framework still does not work in this case.

Consider another Gettier-type case. Imagine that Smith is called into his manager's office. Upon arriving, Smith notices that his manager, Vince, has a lot of books lying around in his office. From what he saw, Smith forms the belief that Vince has a collection of a lot of books. However, unbeknownst to Smith, the books lying around Vince's office are not his but are owned by the company. But Vince does have a good book collection which just happens to be at his home, not in his office. In this case, Smith has a justified true belief that Vince has a collection of books but does not know it. If we were to analyze this case using Donnellan's linguistic theory of definite descriptions, the same problems for the fake barn and sheep in the field cases apply. It would be difficult and merely arbitrary to ascribe either a referential use or an attributive use to the books that Smith is referring to. As such, the attributive use and the referential use may both be valid. Again, Donnellan's framework becomes problematic and does not resolve the problem in this case.

We can also try to modify Case I in a way that it is still a Gettier problem but in a sense that the modification highlights the problems in Donnellan's framework, making it fail to work. In the original case, Smith obtains information that Jones will get the job and that Jones has ten coins in his pocket. Using the rules of existential generalization, Smith forms the belief that the man who gets the job has ten coins in his pocket. We can modify this concluding belief of Smith. Another way to form the proposition using the rules of existential generalization is to have the belief that "Any man who has ten coins in his pocket will get the job." Changing the first article of the proposition "The" into "Any" is still a logical move of existential generalization. However, this modified proposition removes intuitiveness of the original proposition to ascribe it as having a referential use rather than an attributive one. It becomes harder to ascribe a use-either referential or attributive—using Donnellan's theory to the modified proposition and ascribing a specific use may again just be based on an arbitrary basis. In this modification of Case I, Donnellan's theory becomes problematic.

We have demonstrated that Donnellan's theory of definite descriptions does not extend in all Gettier-type cases. As shown through our examples, either Donnellan's theory fails to work theoretically (e.g., in Case II where there are no definite descriptions), or exposes the possible arbitrariness of ascribing a proposition as referential or attributive (e.g., fake barn example and modified Case I). One possible way to reconcile this would be to prove the existence of a variant of degrees for the openness of propositions for linguistic analysis—that some propositions just call for more

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linguistic analysis than other propositions. However, this is problematic because of the ambiguity of how propositions are subject to linguistic analysis. There is no such standard for the degree of the openness of propositions for linguistic analysis.

Conclusion

Jose and Mabaquiao, using Donnellan's theory of definite descriptions, argue that Gettier's Case I is not a valid counterexample to the traditional account of knowledge because (e) is false and is hence not a case of a justified true belief. While this analysis certainly has merits, we have noted some concerns specifically in the use of Donnellan's theory and the application of the same analysis to other Gettier-type cases. We have demonstrated that the insistence of Donnellan's theory of definite descriptions on mutual exclusivity is problematic, and that Kripke's theory of references poses as a viable alternative framework. As a two-level theory, Kripke's theory allows for the ambiguity of truth values for propositions that are unclear in meaning, like that of Case I. Using Kripke's theory, (e) is still true with respect to its semantic reference and is still a case of a justified true belief. We have also demonstrated that Donnellan's theory does not extend to all Gettier-type cases, possibly implying that the Gettier problem may require more than a linguistic solution, precisely because the problem is not merely linguistic in nature.

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