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Bruneau, Damien

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The Justification of Memory Beliefs

MA Research Report (Philosophy)

Damien Bruneau

0404143G

18 April 2012

Declaration

I declare that this research report is my own unaided work. It is submitted in partial completion of the requirements for the degree of Master of Arts (Philosophy) in the University of the Witwatersrand, Johannesburg. It has not been submitted before for any other degree or examination in any other university.

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Damien Bruneau

18 April 2012

Acknowledgements

I am thankful to the University of the Witwatersrand. This research was funded, in part, by a post-graduate merit award from that institution.

Additionally, I am deeply grateful to my supervisor, Prof Mark Leon. His encouragement, patience and understanding made the completion of this project possible. His careful reading of draft material and insightful comments helped to make this paper much better than it would otherwise have been.

Abstract

In this paper I intend to argue for a position on the justification of memory beliefs. I call that position Mnemonic Phenomenal Conservatism (M-PC). My position is most similar to that set out by Huemer in *The Problem of Memory Beliefs*. M-PC is a dualist theory insofar as it endorses both a preservationist condition (PRES) and a conservative condition (PC). Mnemonic Phenomenal Conservatism can be stated as follows:

M-PC:

a) PC**:** If it seems to S that p, then, in the absence of defeaters, S thereby has at least some degree of justification for believing that p; and
b) PRES: For any subject, S, his memory belief p is justified all-things-considered at T2 iff p is justifiedly formed by S at an earlier time, T1.

I motivate M-PC in three ways. The broad contours of my argument are as follows:

i) Firstly, I argue for the dualistic nature of any satisfactory account. I do this in Section 2 by showing that our intuitions regarding the justification of memory beliefs are likely to be influenced by the perspective that we take. These are the 'historical' and the 'time-slice' perspectives. Since we consider memory beliefs from two distinct perspectives, a satisfactory theory of memory beliefs must account for the intuitions generated by looking at problem cases from each of these perspectives.
ii) Secondly, I argue that PRES is a necessary part of a satisfactory account. I do this in Section 2 by a reductio on the denial of PRES. There, I also show that a similar preservationist condition is unable to account for our time-slice intuitions: our puzzle is missing a piece. Throughout the paper, the way that PRES operates in dealing with problematic examples should convince us the PRES does most of the heavy lifting in accounting for our historical intuitions.
iii) Finally, I argue that PC is the missing piece of the puzzle. My argument to this effect is abductive. While evidentialism (two-types), coherentism and reliabilism fail to account for our time-slice intuitions, PC does so with very little fuss. Thus, PC provides the most plausible condition to add to PRES. Section 3 and 4 show that together these conditions handle mnemonic problem cases of every standard variety.

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Section 1

1.1 Overview

I have a lot of beliefs. Among thousands of other things, I believe that there is a desk in front of me; I believe that I woke up early this morning; I believe that the sun will rise tomorrow and I believe that 2 + 2 = 4. Furthermore, I think that most of my beliefs are justified. When pressed I can often provide some kind of justification for my stated beliefs: I might tell you that I can *see* my desk; or that I *remember* waking up early; I might provide an *inductive argument* to the effect that the sun will rise tomorrow; and I might tell you that I believe that 2 + 2 = 4 just because I have *thought* about it. On the face of it these all seem to be fair reasons for holding the given beliefs, but we need not cease to enquire. At this point we might ask: why should I think that seeing (or remembering or induction or reason) justifies a belief? This paper is concerned with exactly that type of question. In particular, I will be concerned with the *justification of memory beliefs*.

Several prominent accounts claim to explain how and why we are justified in holding our memory beliefs: Reliabilists argue that this is the case simply because our capacity to remember is a reliable mechanism; preservationists argue that memory preserves whatever justification we had when forming the beliefs that we later recall; coherentists argue that the coherence of memory beliefs with other beliefs (mnemonic and otherwise) provides us with the justification that we are after; and foundationalists argue that memory beliefs are the bedrock at the end of a justificational chain.

Here my objective is to consider the plausibility of these theories. I aim to conclude that a version of Michael Huemer's dualistic theory shows the most promise. However, the theory that I propose will be weaker than Huemer's. Among other things, I leave more room for interpretation along externalist lines. This openness is indicative of my approach. Rather than provide a full account of epistemic justification with respect to memory beliefs, I aim to provide two conditions that a satisfactory theory must meet.[1] My argument runs as follows.

In Section 2 I distinguish between two perspectives that are commonly adopted in discussion of mnemonic justification. I call these the historical and the time-slice perspectives. To see justification from the historical perspective is to adopt a God's-eye-view and consider the

[1] One reason for my limited goal is that I think that the full account depends on what we think about other types of justification (perceptual, introspective, etc). Such considerations are beyond the scope of this paper.

justification that an agent has over a period of time. To adopt a time-slice perspective is to see a subject's justification from his point of view. From this perspective it looks like a matter of what we can best expect from a subject (epistemically speaking) at a specific time. These perspectives reflect (but are not the same as) Goldman's weak and strong justification.

In order to show that these perspectives are common in the literature on mnemonic justification, I begin with a vital dispute in the area: the dispute between generativists and preservationists. Generativists hold that the faculty of memory can generate justification. Preservationists deny that claim. The most important recent discussion of the issue is found in an exchange between Jennifer Lackey and Thomas Senor. I argue that the disputants are looking at justification from different perspectives. Recognising the historical and time-slice perspectives helps us to resolve the dispute. I contend that both perspectives are legitimate and a sufficient theory of justification must accommodate the intuitions that we have when looking at justification from each.

Thus, I begin to examine what parts of the well-known theories on mnemonic justification could explain our intuitions. I begin with our historical intuitions. A preservationist condition (PRES) accounts very well for those intuitions.[2] Moreover, I argue that the rejection of PRES would lead us to say absurd (or at least extremely counter-intuitive) things about justification. As such, I accept PRES. It forms one part of my theory of mnemonic justification on the grounds that it explains our historic intuitions and can be supported by a very strong independent argument.

Next I consider whether a preservationist condition can account for our time-slice intuitions. I argue that two standard counter-examples show that it cannot. That shown, I move on to examine other widely-held theories in search of one that can explain our time-slice intuitions.

In Section 3 I consider reliabilism and evidentialism. These are two very widely held and (generally) opposed epistemic views. I test each position for suitability on two important grounds. Firstly, I ask if the theory is plausible. Secondly, I ask if it can account for our time-slice intuitions regarding mnemonic justification.

I begin my examination of reliabilism by considering an objection to the theory. Huemer argues that his Clairvoyant Brain case undermines reliabilism. I show that it does not. However, in showing this, it becomes apparent that reliabilism cannot account for our time-slice intuitions. This is because reliabilism is naturally concerned with strong justification. Our time-slice intuitions are very much like those that we have regarding weak justification. Since reliabilism

[2] PRES: For any subject, S, his memory belief p is justified all-things-considered at T2 iff p is justifiedly formed by S at an earlier time, T1

has nothing to say regarding weak justification, it is not a theory apt to account for our time-slice intuitions. This is made clearer by thinking about what reliabilism says about cases involving apparent beliefs - the same types of cases that showed that a preservationist condition could not account for our time-slice intuitions.

Moving on to evidentialism, the first thing that I do is distinguish between two variants of the theory: doxastic and non-doxastic evidentialism. I show that the problem of forgotten evidence is fatal to doxastic evidentialism - it simply cannot account for our intuitions about mnemonic justification. Non-doxastic evidentialism is more promising. However this account fails too. Its major problem is that it relies on phenomenological seemings (or appearances) - where 'phenomenological' means essentially quasi-perceptual. Our memory beliefs do not necessarily produce such seemings. Since non-doxastic evidentialism relies on phenomenological seemings to act as justifiers, the theory fails to account for all cases of mnemonic justification.

The manner of non-doxastic evidentialism's failure motivates my next move. I consider a theory that puts epistemic weight on non-phenomenological seemings. That theory is Huemer's phenomenal conservatism. While phenomenal conservatism may be a species of evidentialism, it is not uncontroversially so. Thus I treat it as separate from evidentialism.

I begin Section 4 by explaining Huemer's phenomenal conservatism. The position is characterised by the conservative claim PC.[3] I note that Huemer is committed to various other claims including internalism and that PC is the only source of foundational justification. I aim to consider PC independent of those accoutrements. Since PC is to provide the second part of my theory, I add it to PRES to give us my proposed theory, Mnemonic Phenomenal Conservatism (M-PC). As before, I consider M-PC's suitability to my project along two lines: I ask if the theory is plausible and if it can account for our intuitions regarding mnemonic justification.

I begin with the second test. I briefly recount some of the cases presented earlier in this paper that were problematic for other theories. Applying M-PC shows that it can easily deal with our intuitions in those cases. I then move on to cases that provide specific challenges for M-PC.

Laurence Bonjour's famous clairvoyant case has been wielded against Huemer's phenomenal conservatism. The suggestion is that phenomenal conservatism cannot account for our intuitions in that case. If that is true, then it is unlikely that M-PC can deal with that case either. So, my first challenge is to test M-PC against clairvoyance cases. I argue that they can deal with

[3] PC**:** If it seems to S that p, then, in the absence of defeaters, S thereby has at least some degree of justification for believing that p.

our intuitions in these cases. I also show that clairvoyance cases might well pose a problem for reliabilism.

Next, I confront Richard Foley's counter-example to epistemic conservatism. I argue that even a refined example of that type gains no traction against M-PC. My argument here is instructive since it relies on the historical component of the theory.

Having shown that M-PC can account for our intuitions in the most prominent and difficult cases regarding mnemonic justification, I have fulfilled one of my two criteria. What is left is to show that M-PC is plausible. I have two things to say in this respect. Firstly, the rebuttal of two forceful arguments against M-PC sets aside prominent reasons to think that M-PC is implausible. Secondly, we can construct an abductive argument for M-PC.

In Section 5 I tie up certain loose ends. I consider the impact that accepting M-PC would have on our views regarding internalism and externalism. I conclude that M-PC would impose certain conditions on those views. One would certainly have to give up traditional internalism in the light of M-PC. It is less clear that the same is true of traditional externalism. Nevertheless, M-PC is capable of preserving the most important intuitive claims that are held by both internalists and externalists.

I also address M-PC's inclusivity. Given the sparse commitments of M-PC it is compatible with versions of several popular epistemic theories. I emphasise that this is a virtue of M-PC. The theory allows us to deal with difficult problems in the epistemology of memory without forcing our hand on other epistemological issues. Thus, epistemologists ought to embrace M-PC and see its component parts as important constraints on a general theory of justification. Any general theory that rejects M-PC will struggle to deal with the epistemological problems of memory.

Finally, I point to two areas of concern. M-PC will be better grounded if we can complete two projects. Firstly, a complete account of the metaphysics of appearances will provide additional support for PC. Secondly, an independent argument for PC will provide better support than my abductive argument. These are projects for further research.

Before I attend properly to my positive project it will be useful to do some theoretical ground-clearing. In the rest of Section 1, I consider the key concepts at work in this paper. I attempt to point out some important areas of difficulty and make clear what I mean by each of the relevant terms.

1.2 Preliminary work

1.2.1 Memory Beliefs

Central to this paper is the concept of memory beliefs. In my view, philosophers are often unclear about precisely what they mean by this term so I shall spend some time making clear what I mean by it.

Let us start with belief. I take beliefs to be made up of two parts: a proposition and the relevant propositional attitude i.e. affirmation or belief. So when I believe (occurrently) that my walls are purple, I have before me the proposition 'my walls are purple' and I have an attitude towards this proposition; one of affirmation – I believe it to be true.

We should be careful to distinguish between two types of propositions that might plausibly be brought up by our faculty of memory. Tomorrow I shall have the belief that *my walls are purple*, but I shall also have the belief that *I remember that my walls are purple.* The type of beliefs relevant to this paper will be the first: beliefs like *my walls are purple*. These can properly be called memory beliefs. Those of the second type seem to me properly described as introspective beliefs. In this case I have an introspective belief about a memory belief.

We can better understand the difference between the two by reflecting briefly on the identity criteria for beliefs. Two beliefs are identical where both look upon the *same* propositional content with the *same* propositional attitude.[4] When we have a memory belief, we take the proposition at hand to be identical to some earlier proposition. The propositional content of introspective beliefs is newly created even when it refers to some past belief (as in the example above).

We should also distinguish between occurrent and non-occurrent memory beliefs. It is clear that the faculty of memory gives us the power to retain beliefs without always being conscious of them. When we consciously have in mind some proposition and an affirmative attitude towards that proposition, we have an occurrent belief. When we have a proposition and the relevant attitude stored in our memories ripe for activation under the correct circumstances, we have a non-occurrent belief. For the most part I shall treat non-occurrent beliefs dispositionally.[5] That is, non-occurrent beliefs are *disposed* to become occurrent beliefs under the right conditions. Our faculty of memory does two jobs: storage and retrieval.

[4] The identity of beliefs over time might not be this simple, but I shall return to this point later.
[5] This might not always be satisfactory. Again, I will return to the point later.

Now we are in a position to consider what makes a given belief a *memory* belief. I think that beliefs can be categorised according to their sources: Beliefs that I form on the basis of perceptual experiences, we call perceptual beliefs; beliefs that we form on the basis of testimony we call testimonial beliefs; and so on. So where beliefs have their roots in the faculty of memory, we can call those memory beliefs. This term will cover both stored and occurrent memory beliefs.

As I understand the faculty of memory, it is fallible in much the same way as our senses are. So we might have mistaken beliefs that are the product of our faculty of memory. For example, I might recall being the top student in my high-school maths class when in fact James was the top maths student (this memory might be either stored or occurrent). In this case, my memory belief does not correspond with any actual past state of affairs, for I was never the top student. I take it that this is nevertheless a *memory* belief albeit a false one. Let us call beliefs of this kind 'non-veridical memory beliefs'. Let us call memory beliefs that do correspond appropriately to actual past events 'veridical memory beliefs'.[6]

On the face of it, reference to the faculty of memory seems to do the trick of paring off the class of memory beliefs from other classes of belief. However, things are not that simple. There is some contention over precisely how we should specify the workings of the faculty of memory. Following Senor (2010) we can broadly specify two competing views: causal and experiential theories of memory. The causal account of memory posits that a belief is a memory belief in virtue of being properly causally connected to a previous event, state or belief. The implication here is that a belief that is not properly causally connected to an earlier event cannot be a memory belief.[7] Causal theories allow for non-veridical memory beliefs. They argue that those beliefs are properly causally connected to previous belief but have been altered in the time that they have been stored.[8]

Proponents of the experiential account explicitly deny the causal account. They might point to cases like the one above in which I mistakenly thought that I was the best maths student in class: the causal theory seems to rule out that example as a case of memory belief. In that case, there is a sense in which the present belief is inappropriately related to a past event. In fact, it is not clear that there is *any* past event that my belief attaches to since the case is one of non-veridical belief. In order to count beliefs like my best-maths-student belief as *memory* beliefs, the experiential theorist claims that a belief is a memory belief in virtue of having a

[6] See Bonjour (2010) Chpt 8 for a taxonomy of ways that memory can go wrong.
[7] To some, the term 'properly causally connected' might seem unacceptably vague here. Indeed it is. However, clarifying precisely what this term means is a job for the causal theorist. Since I mention the causal theory only to set it aside it is certainly not a job for this paper.
[8] See Michaelian (2011) for an account of how memory might ordinarily change while stored.

characteristic feel: A memory belief is one that would, on reflection, appear to the subject to be one that she remembers.

The causal theorist might have some retort. Perhaps a full account of 'proper causal connection' might give us reason to include the best-maths-student beliefs in the class of memory beliefs. For example, a causal theorist might point out that a memory belief that was formed on the basis of a perceptual error is still a memory belief. This is not the place to decide that matter.[9] However, we see that a weak causal theory can include non-veridical memory beliefs. So adopting a causal theory would not necessarily exclude those beliefs from the present investigation.

For the most part, I try to avoid any commitment to either the experiential or causal account. However, sometimes in this paper I lean towards an experiential account, assuming that memory beliefs are those which appear to be caused by some past event and stored over time. That said, I think that a theory of mnemonic justification requires a historical component. So, adopting an experiential approach does not seem to diminish the importance a of belief's history to the present discussion.

1.2.2 Remembering and apparent memory

In discussions of the metaphysics of memory, perhaps the waters are muddied by widely held views about 'remembering'. This warrants a quick excursion and a note on my terminology.

C.B Martin and Martin Deutscher presented an argument regarding the metaphysics of factive memory.[10] They claim that a causal condition is a condition on veridical memory beliefs. In virtue of focussing narrowly on veridical beliefs, their theory is distinct from what Senor calls the 'causal' theory. Philosophical use of the term 'remember' has been indelibly marked by their discussion.

They argued convincingly that subject S remembers x iff

i) *S* has observed (that) *X* in the past; and

ii) *S*'s current representation of *X* is appropriately causally related to *S*'s earlier experience of (that) *X* via a memory trace

[9] Even if it was, that might prove difficult. Senor (2010) contends that there appears to be no theory-neutral way of deciding the issue. The decision as to whether the best-maths-student case (and similar cases) provides us with a memory belief or not seems to rest on either brute intuitions or our views on the externalism/internalism debate.

[10] (Martin & Deutscher, 1966)

On this analysis to remember is to have a recollection related to some prior event. So, 'remember' is a success-term. When we remember, our apparent memories are veridical.

I think that it is possible for us to have apparent memories without such a connection. That is, when our apparent memories are non-veridical. Moreover, those apparent memories are epistemologically significant.

I shall maintain traditional usage under which the term 'remembering' is factive. To cover both veridical and non-veridical cases, I shall refer to 'apparent memories'.

1.2.3 Memory disjunctivism

One challenge to my characterisation of memory beliefs is the possibility of memory disjunctivism. That position asserts that memory is factive. The disjunctivist claims that while (what I call) memory beliefs are phenomenologically indistinguishable, we need not lump both veridical and non-veridical memory beliefs into the same category. In fact, the disjunctivist claims that we ought to think that non-veridical 'memory beliefs' are not *memory* beliefs at all.

This position on memory beliefs parallels disjunctivism about perceptual beliefs. While little has been said in the literature about memory disjunctivism, it is plausible that this position will be tempting to those who hold its perceptual analogue.

Since this aspect of the metaphysics of memory beliefs is going to bear on the arguments that follow, I shall briefly point to two reasons for holding a non-disjunctivist position on memory beliefs.

Firstly a non-disjunctivist position on memory beliefs seems to fit best with our common sense views. Consider this case: I present you with twenty pictures, nineteen of which are images from your past and one of which is doctored to make it look like you were in some place where you have never actually been - say Nelspruit. Presented with the set and asked about each photograph in turn, you assert that you remember going to *every* one of the places in the photographs. This way we might elicit from you nineteen veridical memory beliefs and one non-veridical memory beliefs. Are we to say that the one non-veridical memory belief is of a different class of beliefs to the other nineteen? On a common-sense view, surely not.

Secondly, even disjunctivists about perception might be disinclined to accept disjunctivism about memory. Paul Snowden, while defending disjunctivism about perceptual beliefs, suggests that "there are things that can be said to block the disjunctive theory at least in the case of

memory."[11] The details of the argument are not important here. The point that I need to make is that the acceptance of perceptual disjunctivism does not straightforwardly entail mnemonic disjunctivism. In the absence of an argument for the latter claim, we can accept non-disjunctivism about memory beliefs.

The final point to be made about this characterisation of memory beliefs is that it is agnostic with respect to 'memory seemings'. One might hold a non-disjunctivist position on memory beliefs with or without being committed to the existence of specific phenomenological states that occur *necessarily* whenever we have an occurrent memory belief.[12]

1.2.4 Justification

Ordinarily, if you asked what I mean by 'justification', I would proceed to explain by example. Think about somebody from 550 BCE who thought that the sun orbited the earth (call him Anaximander). Think about somebody from 2012 CE who thinks that the sun orbits the earth (call him Fred). From an epistemic standpoint we have fairly straightforward intuitions. We treat Anaximander's belief and Fred's belief differently.

We might use different words to express the difference. We could say that Anaximander is rational and Fred is not; or that Anaximander believes blamelessly while Fred ought to know better. I say that Anaximander's belief is justified and Fred's belief is not. What distinguishes the two beliefs (epistemically) is the property of justification.

Notice that I have not said that justification is a matter of evidence, reliability or duty. I take my characterisation to be agnostic with respect to the issues of justification's structure and its constituent parts.[13]

Having given a common sense account of justification, I proceed to a slightly more technical account.

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[11] (Snowden, 2009, p. 61)

[12] At first blush, memory-seeming agnosticism and the experiential account of memory might appear at odds. There is an apparent tension between defining memory beliefs with reference to experiences and leaving open the possibility of denying that memory beliefs necessarily have an accompanying phenomenological state. However, the positions are not incompatible. The experiential account of memory claims that a belief is a memory belief if *on reflection* it seems to the subject to be something remembered. This seeming is not necessarily part of a memory belief but is necessarily disposed to become present on reflection.

[13] There might be an immediate worry here. We might ask if this intuitive account prejudices an externalist account? I would argue no. This is a very natural account of justification. The property that sets Anaximander and Fred apart is the property that underlies the reasoning in Gettier's examples and is at work in commentaries on Plato's Crito. It is my view that if one wants to be an externalist about justification then one ought to give an externalist account of the epistemic difference between Fred's belief and Anaximander's.

The array of possible layman's terms for the difference between Anaximander and Fred is mirrored in (or even, exacerbated by) philosophers' usage. The philosophical literature on and around epistemic justification is fraught with potential terminological stumbling blocks. There is talk of 'warrant', 'justification', 'entitlement', 'rationality', 'epistemic blamelessness' and many other closely related concepts. I will be concerned with justification. However, to leave it at that is somewhat unhelpful, since 'justification' is a term with a myriad of possible uses. In order to cut through the ambiguity of 'justification', it will help to define it in terms of something more clear and unambiguous.

When I speak about justification I mean something quite simple. Following Pryor, I say "that you have justification to believe P iff you're in a position where it would be epistemically appropriate for you to believe P, a position where P is epistemically likely for you to be true".[14]

Now, you might wonder how the term 'epistemically appropriate' is any less ambiguous than 'justification'. An explanation suitable to satisfying this wonder is two-fold. Firstly, we should notice that 'epistemic appropriateness' is a very broad term: 'appropriateness' covers 'warrant', 'entitlement', 'rationality', etc in the sense that many philosophers use those terms. This breadth should not be confused with ambiguity. Secondly, we should be aware that we are working with a fairly intuitive notion. What I mean by 'intuitive' is that for almost any (suitably fleshed-out) case of believing, we have intuitions about the epistemic appropriateness of the given belief. Take for example your present belief that you are reading a philosophy paper. Without having to reach for a handy epistemology cheat sheet, you have a sense that your belief is epistemically appropriate. If you wanted to do some epistemology, you could wonder if and why that is so. The important point is that pre-theoretically you have a concept of the epistemic appropriateness of this and innumerable other beliefs (both yours and those of other people).

Of course, cases can be presented wherein we are uncertain and tentative about our intuitions. These cases do not say much about epistemic appropriateness except perhaps that our intuitive grasp of the concept is loose around the edges. For this reason, epistemologists will focus on cases about which we are supposed to have firm intuitions regarding epistemic appropriateness (or justification, warrant etc).[15] These types of intuition do a lot of work in epistemology. Plausibly, we use our intuitive grasp of epistemic appropriateness as a platform from which to launch theories about the specifics of what epistemic appropriateness consists in. Such intuitive

[14] (Pryor, 2005)
[15] I have doubts about whether we can have reliable intuitions about certain highly technical concepts. But let's set these aside for now.

grasp is the main business of the present definition. Some theories regarding the specific structure of epistemic appropriateness are the main business of this paper.

To my mind, Pryor's take on justification is largely in line with common sense. However there is one slightly technical point to make: We should be clear that one could be justified in believing P on this definition yet still believe P epistemically inappropriately. This seems like a confusing thing to say. The important distinction at work here is between *appropriately believing* P and *being in a position to appropriately believe* P. An example will help:[16] In ordinary conversation, my scientist friend, Bob, presents several good reasons for me to accept the theory of evolution. His arguments are sound, I fully understand them and I remember them. Yet, I maintain my belief that evolution is false. Shortly afterwards I visit my favourite psychic healer who, upon apparent consultation with the dead, presents an obviously fallacious argument on which grounds I'm told that I ought to believe the theory of evolution to be true. On precisely those grounds I come to believe that the theory evolution is true. In this case we ought to notice two things: Firstly, I ground my belief in evolution on very poor reasons; surely this is epistemically inappropriate.[17] However, I am, in fact, apprised of some very good reasons for my belief (those given to me by Bob). So, I am actually in a position where it would be epistemically appropriate for me to believe in evolution. Where I have failed epistemically is in not believing *for* those reasons. We might say that my belief in evolution is *justified* but not *well-grounded*.[18]

1.2.5 Internalism and Externalism

Certain of our broad epistemic views are likely to have some bearing on what we think about more narrow topics. One instance of this is the impact that internalist and externalist views have on discussions of mnemonic justification.

Throughout this paper I am careful to point out where such views might influence the outcome of a specific line of argument. For the most part, I intend my arguments to be acceptable to internalists and externalists alike. I intend the conclusions of Section 2, to set such commitments aside as far as possible. However, I often have cause to refer to internalism and externalism and it will be helpful to be clear about precisely what I mean by those terms.

[16] This example is based on Huemer (2007, p40)
[17] Having good reasons is one way to have an epistemically appropriate belief. But let's leave it open as to what else might make for epistemic propriety. Perhaps evidence, reasons and experience count.
[18] Justification is a necessary but not sufficient condition for 'well-groundedness'. In this sense, justification is theoretically prior to well-groundedness. This might be one good reason to focus on justification rather than on well-groundedness.

Importantly, we should notice that philosophers of mind and epistemologists mean different things by internalism. The philosopher of mind is concerned with whether the content of a subject's mental states is determined without reference to the external world. The epistemologist is concerned with a type of special access to whatever it is that justifies a subject's beliefs. This special access can be cashed out in various ways.[19]

We can distinguish between two broad internalist views. The first view involves a supervenience thesis:

> **Simple Internalism**: For any belief, p, of a subject, S: S's having justification (or not) for p supervenes on S's mental states.[20]

The second view is a thesis about a person's access to the justificational status of a belief, not a person's access to their justifiers. Essentially the view is this:

> **Access Internalism**: For any belief, p, of a subject, S: S always has special access to the justificatory status of p.

For the purposes of the present discussion, I shall set aside Access Internalism. When I speak of 'internalism', I mean to refer to Simple Internalism.

I take externalism to be the denial of internalism. It can be stated as follows:

> **Externalism**: For any belief, p, of a subject, S: S's having justification for p supervenes on (at least in part) things other than S's intrinsic states.

The intuitions that motivate these positions will come to bear on the conclusions of this paper. I shall point this out wherever it is the case.

[19] See (Pryor, 2001), (Conee & Feldman, 2004, pp. 53-56) and (Huemer, 2006) for several different positions.
[20] This is the position that Conee and Feldman (2004, pp56) call 'mentalism'.

Section 2

Having cleared up some terminological issues, we can proceed in search of a substantive account of the justification of memory beliefs. In this section I consider a fundamental question in this area: Is memory generative or preservative? My considerations centre around the recent debate between Thomas Senor and Jennifer Lackey.[21] I shall argue that Lackey fails to establish generativism. However, the exchange is instructive. From it we learn that our intuitions about justification are informed by seeing cases from two distinct perspectives. I argue that acknowledging the importance of these perspectives goes some way to resolving the dispute. Such considerations give us reason to think that a preservative condition is necessary but not sufficient for an adequate theory of the justification of memory beliefs.

2.1 Preservationism

The preservationist position holds that memory beliefs are justified when, only when and because they were justified when they were formed. The preservationist will say that I am justified in believing that the sun shone last Tuesday because the perceptual belief that I formed last Tuesday about the sun shining was a justified belief. That belief has been held in memory and when I recall it today its justificatory status remains intact. Today that belief is justified for precisely the same reasons as it was when it was formed. This illustrates the core idea that memory acts *merely* to preserve justification. According to the preservationist, justification can only be generated by certain other faculties (typically, perception). This is what it means to say that memory is **preservative**. To say that some justification is conferred on a belief purely because it is a memory belief is to say that memory is epistemically **generative**.

We should note that the generativist theory can still embrace a preservative justificatory component; they might assert that a memory belief is justified for generative reasons *and* in virtue of what made the belief justified in the first place.

2.1.1 Lackey vs Senor on Preservationism

Jennifer Lackey has a subtle argument for the claim that memory beliefs can be epistemically generative. This argument rests on two purported counter-examples to preservationism. Before

[21] (Lackey, 2005), (Lackey, 2007), (Senor, 2007)

we come to the details of the counter-examples, we must do some philosophical ground clearing. Let us start with Lackey's precise formulation of the preservationist position.

Lackey formulates the **Preservation View of Memory** (PVM) in terms of knowledge, justification and rationality. For the purposes of this paper, I will formulate PVM with respect to justification:

PVM: S justifiedly believes that p on the basis of memory at T2 only if

(i) S justifiedly believes that p at an earlier time T1, and

(ii) S acquired justification with respect to p at T1 via a source other than memory.[22]

Given this formulation, we can see the basic form that Lackey's counter-examples must take. She must give us cases where S's belief, p, is unjustified when formed at T1 but justified at T2 and the belief has not been reconsidered in the interim. This would mean that i) is false while it is true that S justifiedly believes that p on the basis of memory at T2. This would suffice for a counter-example, but we should note that any example of this sort would also have the implication of making ii) false. That is, this type of example, if acceptable, necessarily establishes that memory can be a source of justification; that memory is epistemically generative.

Lackey's conception of defeaters[23]

In order to properly understand Lackey's counter-examples we need to come to grips with a key concept: epistemic defeat. An epistemic defeater for a belief is a reason not to hold that belief. Put slightly differently, a defeater is one belief that prevents another from gaining some positive epistemic status (like justification).

Lackey outlines two kinds of epistemic defeater: **doxastic** and **normative**. A doxastic defeater is a belief that a subject already has that makes it unreasonable for her to hold some other belief. For example, my already held belief that all dogs are warm-blooded defeats the belief that my dog is cold-blooded; given my general belief about dogs (a belief that I shall not give up easily), I could not justifiably come to believe that my dog is cold-blooded.

A **normative defeater** for a belief is "counterevidence that one ought to be aware of that indicates that the target belief is either false or unreliably formed or sustained".[24] That is, some belief that the subject *ought* to hold renders unjustified a belief that the subject does hold (or

[22] (Lackey, 2005, p. 637)
[23] I do not accept Lackey's views about epistemic defeat, however we must understand them in order to follow her line of argument
[24] (Lackey, 2007, p. 6)

considers holding). This would be a belief that a subject does not actually hold. An example will help to clarify what this means.

Imagine I tell you that Barack Obama is a professional pole-vaulter. Given that I am a generally trustworthy source of information you believe me. However, you seem to have made some kind of error, epistemically speaking. Lackey would say that you have failed in a particular kind of epistemic duty; you ought to know certain things about the world. Plausibly, one of these is to know that Barack Obama is a politician. So in the present case, there is a normative defeater for the belief that Barack Obama is a pole-vaulter and that defeater causes your belief to be unjustified.

Of course, defeaters can themselves be defeated. If tomorrow a scientist breeds cold-blooded dogs, my reading about it and coming to believe that some dogs are cold-blooded would defeat the defeater in my first example. The claim that all dogs are warm-blooded would be rendered unjustified. So, we can say that a necessary (but not sufficient) condition for the subject's belief to be justified is that the subject has no **undefeated defeaters** for that belief.

Having explained the notion of epistemic defeat we are in a position to see how Lackey's examples work. In each case the subject moves from having defeaters for a particular belief to not having defeaters for that belief. So the subject moves from having an unjustified belief to having a justified belief. This increased justification is said to mean that memory is epistemically generative. Lackey provides us with two cases, one involving doxastic defeaters and the other involving normative defeaters.[25]

Case 1: Arthur, Aunt Lola and normative defeaters

In Lackey's first case, Arthur is told by his Aunt Lola that the mayor of their city accepted a bribe. Aunt Lola had received this information from the mayor's (epistemically reliable) secretary. Arthur forms the belief that *the mayor is corrupt* (B1). However, at that time (T1) and unknown to Arthur and Aunt Lola, the major news media outlets were all running stories to the effect that the mayor had been framed and had not accepted a bribe. These stories only ran because the mayor and his political allies pulled strings behind the scenes. In fact, the allegations were true; the mayor had accepted a bribe. This information was widely broadcast at a later stage (T2) when the falsity of the framing allegations was discovered.

Lackey analyses the case like this: At T1, Arthur formed the belief that the mayor had taken a bribe. This belief was unjustified for Arthur had a normative defeater; he ought to have the belief *the mayor is honest* (ND1) since he ought to have seen all of the evidence to that effect on

[25] (Lackey, 2005)

the news. At T2 there is no such evidence. The news reports at T2 are consistent with Arthur's belief. Thus at T2, Arthur ought to hold B1. So, Arthur's belief was unjustified at T1 and justified at T2. Case 1 is a counter-example to PVM. The shift in justification in this case shows that memory is epistemically generative.

Since a preservationist must argue that memory alone cannot change the epistemic status of a belief there are two broad lines of response. The preservationist must either hold that Arthur's belief is actually justified at T1 or that it remains unjustified at T2. I shall begin with the latter.

Objection: Arthur's belief is unjustified at T2

In order to show that Arthur's belief is unjustified at T2, we should examine his defeater at T1. Lackey claims that *Arthur ought to believe that the mayor is honest* (call this claim ND1). We can reasonably ask why Arthur should believe this. The natural answer is this: Arthur should believe ND1 because *Arthur ought to be aware of what is going on in the news.*[26] His normative defeater is grounded in an epistemic duty.

Returning to T2, we see that Arthur continues to be epistemically negligent; his duty remains unfulfilled. He remains ignorant of what is happening in the news. At T2, his negligence does not result in him holding a belief that is contrary to the one he ought to however, his negligence remains. He continues to fail in an epistemic duty and for that reason he is unjustified in holding the belief at T2. Since Arthur's belief is unjustified at both T1 and T2, the case is not a counter example to PVM.

Lackey might object at this point, saying that we have loaded Arthur (and many of us) with a great epistemic burden. Since his not paying sufficient attention to the news media has rendered his belief about the politician unjustified, we must now embrace the claim that all of Arthur's current-affairs based beliefs are unjustified. This is implausibly strong.

That response does not help Lackey. Let us grant the objection and reject the claim that *Arthur ought to be aware of what is going on in the news.* Now we can return to T1. Lackey claims that Arthur ought to believe that the mayor is honest. Again, we can ask why? Having rejected the epistemic duty, there is no good answer to the question. Without the duty, we cannot ground ND1. Without ND1, Arthur cannot be said to have an unjustified belief at T1.

[26] Of course, this claim is probably going to be context sensitive. It would be implausible to think that a Amazonian tribesman ought to be aware of goings on in the western media. However, if you're reading this paper then you're probably in a context similar enough to Arthur's to mean that similar epistemic duties apply to you (if they exist).

Lackey is on the horns of a dilemma: Either Lackey accepts or rejects the claim that Arthur has an epistemic duty to keep up with the news. Rejecting the epistemic duty renders Arthur's belief justified at T1, accepting it renders his belief unjustified at T2. Either way, the case is not a counter example to PVM. So, Case 1 fails to undermine PVM.

Case 2: Nora, Calvin and doxastic defeaters

Lackey's second case involves the loss of a doxastic defeater. The central character in this piece is Nora. Having fallen victim to peer pressure from her religious friends, but ordinarily epistemically sound, Nora has come to believe that *all testimony from atheists is completely unreliable* (call this belief DD1). In a conversation with Calvin – epistemically reliable but a known atheist - Nora lets down her guard. Based on Calvin's testimony, she comes to believe (at time, T1) that *Hitler was raised a Christian* (B2). As the years pass, Nora dissociates from her religious friends and simply forgets her belief about the unreliability of atheists. However, Nora continues to believe that Hitler was raised a Christian even though she sees no further evidence for the claim. At time, T2, she holds this belief but not the belief about the testimony of atheists. She has forgotten her doxastic defeater, DD1.

Lackey's analysis is this: At T1, Nora forms an *unjustified* belief about Hitler based on the testimony of an atheist. The belief is unjustified because it is inconsistent with her belief about atheists' testimonial reliability – Nora has an **undefeated doxastic defeater** (DD1) for the newly formed belief. At T2, having forgotten the claim about atheists, Nora no longer has a doxastic defeater for her belief about Hitler and since it is now undefeated, it is justified. Again, a belief has become justified merely in virtue of being a memory belief and so memory appears to be epistemically generative.

The preservationist objections to this case will follow the same broad structure as the replies to the first case: Either the belief must be shown to be justified at T1 or it must be shown to remain unjustified at T2. However, the strategies for showing this don't map directly onto the preservationist strategies in the first case and so I shall give an account of a few plausible lines.

Objection: Nora's belief is justified at T1

In order to argue that Nora's belief at T1 is justified the starting point is to question the standing of a false defeater. Let us grant that DD1 is a doxastic defeater. It is not clear that it is undefeated. Remember, B2 is unjustified only in the presence of an *undefeated* defeater.

Given that Nora is an ordinarily responsible epistemic agent who has apparently engaged in conversations with atheists (like Calvin) surely she *ought* to be aware of a fairly substantial body of evidence to defeat her belief that the testimony of atheists is unreliable. On this basis, it

is plausible to think that Nora ought to have had this belief at T1: the testimony of atheists is reliable. This would be a normative defeater for the claim that the testimony of atheists is unreliable. So, Nora's purported doxastic defeater would be defeated. Thus, DD1 would not render B2 unjustified.

Of course, Lackey would respond that there is no such normative defeater. That is a specification of the case.

Objection: Nora's belief is unjustified at T2

Let us allow that response. Now we have reason to think that Nora's belief remains unjustified at T2. Although Nora no longer believes that the testimony of atheists is unreliable, at T2, perhaps she *ought* to believe it.

Again, we need to call on the idea of an epistemic duty. A good candidate for one such duty is this: One ought to remember the important epistemic facts that one learns. On the basis of that duty, Nora has a normative defeater at T2. She ought to believe that the testimony of atheists is unreliable.

In response, Lackey might ask why we should have such a duty. Here is why: Imagine that, at T1, you learn that all testimony is unreliable. Say that this is true. Several years later, at T2, you are told that the moon is about to explode. You have forgotten that all testimony is unreliable and come to believe that on the basis of testimony. Surely, an epistemic assessment of this case would find that you're culpable of an epistemic wrong at T2. You ought not to believe that the moon is about to explode because you ought to have remembered the important epistemic fact that all testimony is unreliable.

Nora's belief about atheists is similar. It covers a large class of people and, if true, seems an important epistemic consideration. It would help her to discern probable truths from probable lies. If she formed that belief justifiedly, she should retain it.

Again, Lackey faces a dilemma. Either Nora's belief about the testimony of atheists is justified or it is not. If it is not, she seems to have a defeater for it at T1. In that case B2 is justified at T1. If it is justified at T1, Nora should retain that belief. In that case, Nora has a normative defeater for B1 at T2 and B1 is thus unjustified at T2. In either case, Lackey's counter-example is undermined.

So, Lackey does not seem to be able to satisfactorily resist objections to her counterexamples. Her arguments do not establish the falsity of PVM.

Senor's *in principle* objection

Setting aside the problems raised above, Senor thinks that there is a deeper reason to reject Lackey's argument for generativism. He claims that preservationists do not defend PVM, rather they defend this more nuanced claim.

> NP: no new justification is created by the faculty of memory.

Senor highlights the difference between NP and PVM by appealing to the difference between prima facie and ultima facie justification. Prima facie justification is that justification that a person has in virtue of some positive ground for belief. For example the evidence of my senses might provide some non-inferential justification for my belief that there is a computer in front of me. That justification might also be defeated. I could have evidence to the effect that my senses are unreliable. In that case, I wouldn't be justified in believing that there is a computer in front of me. The evidence regarding my senses would not be prima facie justification, it would undermine prima facie justification. We can see from this example that considerations of justification work in two directions. Justifiers work positively to create prima facie justification and defeaters work negatively to undercut or undermine prima facie justification. The product of their interaction is ultima facie justification or the lack thereof.

So, we can now better understand Senor's claim. To defend NP, preservationists argue that memory cannot operate in that positive sense. That is, memory cannot create prima facie justification.

Now it becomes obvious why Lackey's examples miss their mark. In each case, memory retains the originally formed belief. This creates no justification. The purported change in justification at T2 is the result of the absence of defeaters. Memory has done no positive justificatory work. The changes over time cause less undercutting work to be done by defeaters. So, even if Lackey's examples were uncontroversial, in those instances memory would be merely preservative in Senor's sense.

Notice that the focus on prima facie justification pushes the discussion towards considerations of belief formation. Lackey's focus is different. She aims to look closely at the belief at T2. Particularly, her deliberations give weight to what we can best expect (epistemically speaking) from the subject at that time. We begin to see that the dispute might turn on the authors' perspectives as much as it turns on the facts of the cases. In the rest of this section, I try to bring out that point as perspicuously as possible.

2.1.2 Justification-switch cases

The dispute between Lackey and Senor is a detailed exchange about an important type of case in discussions of the justification of memory beliefs. In these cases, a subject, S, unjustifiably forms some belief, p, at T1. Later, at T2, that subject recalls p. The cases are specified so that the subject has no defeaters at T2. So, in these cases the subject seems justified in holding p at T2. It will be instructive to set aside the previous debate for a moment and consider these cases in general.

By fleshing them out in slightly different ways, preservationists and generativists aim to use these cases against each other. Preservationists argue that such a switch is an absurd consequence of generative accounts and generativists argue that the uncontroversial occurrence of such a switch is something that preservationists cannot account for. It will pay to examine the motivation for each of these positions.

First, consider a more concrete example: In 2003, I form the belief that I am the best maths student in my class. This goes against the evidence that I have. I have seen my classmates' marks on the notice-board and James consistently out-performs me. Nine years later, I have forgotten about James and his marks. However, I still recall my ill-formed belief that I was the best student in class.

Preservationists argue that it makes no sense for a belief to become justified in virtue of forgetting. The fact that my belief was a product of wishful thinking should continue to count against me despite the passage of time. Surely, it is not reasonable for me to believe that I was the best student in class. That belief is unjustified.

Generativists take a different view. They would ask you to put yourself in my shoes. Given the beliefs I already have and the things that I remember, what could I do but believe that I was the best student? Surely, you don't require me to re-investigate this belief. Moreover, you cannot require me to give it up. If you did, you would require me to give up all of the beliefs for which I have forgotten my evidence. It looks like I am rational to retain the belief that I was the best maths student in my 2003 class.

The preservationist and the generativist both make persuasive points. I'm drawn to both of these lines. Of course, their points seem opposed and I can't accept both conclusions, at least not without a very good explanation of why they are actually consistent. I think there is such an explanation.

That explanation begins with a consideration of the assumptions that are at work here. The generativist takes a narrow view of the subject. If we consider the epistemic resources that the subject has available at T2, the epistemically appropriate thing for him to do is believe. The intuition here is internalist. The justification of a belief that a subject has at a particular time seems to depend on what evidence is available to him. They are inclined to accept a time-specific internalist claim along the lines of Simple Internalism.

> For any belief, p, of a subject, S, S's having justification (or not) for p **at a time, t,** supervenes on S's mental states **at t**.

Those who follow the generativist line are inclined to look at a narrow picture of an individual. The important claim for them is that S is justified in believing p *at a particular time*.

The preservationist is taking a broad view of the subject. It is not appropriate for a subject to believe unjustifiedly. In the absence of additional evidence, an unjustified belief must surely remain unjustified. We can see that this view incorporates the idea that a belief is held over time.

It seems that there are two different, but legitimate views on justification at work here. Asserting such is not without precedent. Alvin Goldman characterises two different views in terms of weak and strong justification. He claims that:

> there are two distinct ideas or conceptions of epistemic justification. On one conception, a justified belief is (roughly) a *well-formed* belief, a belief formed (or sustained) by proper, suitable, or adequate methods, procedures, or processes. On another conception, a justified belief is a *faultless, blameless,* or *nonculpable* belief. As our example suggests, the first of these conceptions is stronger, or more stringent, than the second. It requires the belief to be formed by methods that are *actually* proper or adequate, whereas the second conception makes no such requirement. I therefore call the first conception the *strong* conception and the second the *weak.* Each of these seems to me a legitimate conception. Each captures some chunks of intuition involving the term 'justified' (in its epistemic applications).[27]

I agree with Goldman that this is one good way to distinguish two separate but legitimate concepts of justification. Further to his points, I think that different conceptions are particularly perspicuous in cases involving memory beliefs. In these cases, we are inclined to either view cases from an all-times-considered, historical perspective or a narrow, time-slice perspective. From the former perspective, we make judgements that follow the contours of Goldman's strong

[27] (Goldman, 1992, p. 128)

conception and from the latter we tend to make judgements that follow the contours of Goldman's weak conception.[28]

Having recognised these two perspectives, we can begin to untangle justification switch cases and the dispute between preservationists and generativists. I contend that, for the most part, the parties to this dispute are speaking past each other. The preservationist is focussed on our historical intuitions and the generativist is focussed on our time-slice intuitions.

Returning to the Lackey/Senor dispute we see that, in both cases, Lackey's account of justification at T2 sets aside considerations that were important at T1. In her first case, the relevant factor was the unwatched television reports. The reports changed their tune and thereby no longer came to bear at T2. In her second case, Nora's belief about atheists was forgotten. In that way, it no longer came to bear on narrowly focussed judgements at T2. Lackey's claims are dependent on a time-slice perspective at T2.

Often Senor's responses (and my responses) aim to reintroduce factors from T1. In the first case, we might hold that Arthur's epistemic failing has not gone away. He is still neglectful of current affairs and so his current affairs related beliefs must remain unjustified. In the second case, one line of response is to argue that forgotten doxastic defeaters become normative defeaters. This is essentially an attempt to make defeaters from T1 come to bear at T2. In these ways, Senor's responses are dependent on a historical perspective of the cases.

So long as we carry on in that manner, the dispute is intractable. It is worth taking a step back and reconsidering what it is that we are trying to do. In my view, what matters most for a theory of mnemonic justification is not that it is preservationist or generativist but rather that it captures our intuitions. Since these intuitions follow two lines, an adequate theory must account for two sets of intuitions. We can now turn to these intuitions one at a time.

2.2 The historical perspective

In later work, Goldman recognises the historical perspective that I have mentioned.[29] He argues that the 'historicity of justifiedness' is best accounted for by a preservationist condition. I agree with him. Let me very briefly explain why.

Goldman characterises a preservationist condition as follows:

[28] This is not to say that the two perspectives are inextricably linked to cases of strong and weak justification. I mean only to point out a general correlation not a necessary one.
[29] (Goldman, 2009, p. 14)

> (PM) If S has a justified attitude D toward proposition P at t, and if S retains attitude D toward P until the later time t', via memory, then, *ceteris paribus*, S is still permitted to have attitude D toward P at t'.[30]

Since I am interested in a preservationist condition expressly as a claim about justification from the historical perspective, let us reformulate the claim.

> [PRES] For any subject, S, his memory belief p is justified all-things-considered at T2 iff p is justifiedly formed by S at an earlier time, T1.[31]

Note that I have introduced some new terminology. Henceforth I shall use 'justified all-things-considered' to denote beliefs that I consider justified from the *historical* perspective. I shall use 'justified at t' to denote beliefs that I consider justified from the *time-slice* perspective.

Goldman gives us good reason to accept PRES. Let us see what follows from its rejection. If no such condition holds, there is no justificational inheritance from one moment to the next. The beliefs that I formed earlier today now have a clean epistemic slate.[32] We must re-assess their justifiedness in terms of my current states. This has dire consequences. Think about the possible justifiers I have for my belief that I had eggs for breakfast. I might appeal to certain other beliefs that I hold. However these beliefs are only legitimate justifiers if they, themselves are justified. Without any epistemic carry-over, it is not clear that they could be.

Of course, we could try to stop the regress in the traditional foundationalist manner. For example, I could appeal to the experiences that I am presently having as the bottom-most level of my epistemic structure. However, there are two problems with that move.

Firstly, I hold some memory beliefs (justifiedly) that don't seem apt to be justified by any of my current experiences. I believe that the sun is approximately 93 million miles from the earth. Assuming that belief is not occurrent, nothing in my present experience justifies that claim. My perceptual experiences of sitting at a computer certainly don't.

Of course, one might argue that the mere fact that it *seems to me to be the case*, provides some justification. But this just leads us to a second problem: Insofar as my present experiences can justify my memory beliefs, they only justify my *occurrent* memory beliefs. For example, we could claim that my seeming to have had eggs for breakfast justifies my believing that I had eggs for breakfast. That is acceptable as far as it goes, but when that belief is not occurrent I am

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[30] (Goldman, 2009, p. 15)
[31] In order to keep my formulation as simple as possible, I leave the ceteris paribus assumption tacit. In Assume that S gains no new evidence for or against p after its initial formation.
[32] Goldman calls this *continual clearing of the justificational slate.*

aware of no such appearance. Worse still, the vast majority of my beliefs are not occurrent. So, without PRES, it looks like we have, at best, a vastly inadequate account of the justification of my memory beliefs.

On these grounds it seems to me that we must accept a preservationist condition. Additionally, it seems likely that PRES will account for many of our historical intuitions. That this is so will become apparent later in the paper when we consider several examples of purportedly problematic memory beliefs.

For now, we can ask whether a preservationist condition is apt to satisfy our time-slice intuitions.

2.3 Time-slice intuitions

Using the terminology that I stipulated above, we can see what a preservationist condition might look like with regard to our time-slice intuitions. Minimally, it must endorse the following conditional:

> PRES*: If a subject S's memory belief, p, is justified at T2 then p was justifiedly formed by S at an earlier time, T1.[33]

We can easily show that PRES* is false. There are several widely known examples of cases where a belief is unjustifiedly formed, but justifiedly believed (or better, retained) at a later stage.

Reconsider the case about my malformed belief that I was the best maths student in class. Specifically, think about my belief at T2, when I had lost all of my evidence, yet maintained the belief. Ought I to discard that belief at T2? Of course not. If I was required to do that then I would be required now to discard any number of beliefs that I have retained in the absence of evidence for or against them. Since, I am not required to discard these types of beliefs, retaining them seems justified. At the present time, I am justified in believing that I was the best maths student in my high-school class. So, the antecedent of PRES* is satisfied. The consequent is false given the stipulations of the case. So, we have a clear counter-example to PRES*.

For those not persuaded by justification-switch cases, Huemer provides another example. He presents us with a version of Russell's five-minute hypothesis.

[33] This conditional is entailed by a stronger by conditional that perhaps follows PRES more directly: *A belief, p, is justified at T2 iff p is justified at the time that it is formed, T1*.

Imagine that God created someone five minutes ago. This person is a molecule-for-molecule facsimile of me five minutes ago and appears to have all of the same mental states as me. He shows the same proclivity towards Scotch, he feels like it's almost lunch time (again) and when asked he will tell you that he remembers riding an ostrich in Oudtshoorn. Call this person $Damien_2$. We both believe that we had eggs for breakfast.

Given the qualitative identity of $Damien_1$ (me) and $Damien_2$, it seems that the epistemic status of their respective beliefs should be identical. From the narrow, time-slice perspective it is implausible to assert that molecule-for-molecule identical beings differ with respect to whether or not their beliefs are justified. So let us say that presently (i.e. at T2) both Damiens have the justified belief *I had eggs for breakfast*.

Now let us consider the formation of our beliefs. I formed mine this morning on the basis of my perceptual experience of cooking and eating eggs. $Damien_2$ spontaneously formed his five minutes ago. Spontaneous belief generation is a dubious way to form beliefs. Surely $Damien_2$'s beliefs were all *formed* unjustifiedly. At the least, $Damien_2$'s beliefs are not as clearly justifiedly formed as $Damien_1$'s are. Again, we have a counter-example to PRES*, since PRES* cannot consistently account for *any* difference in the justification of their beliefs.

Before we move on, we should consider what the maths student and duplication cases have in common. In my view, the specific feature that PRES* has difficulty accounting for is that we are inclined to think that *we can justifiedly hold beliefs on the basis of apparent memories in relative isolation* (that is, isolation from defeaters). I will return to this feature in discussing reliabilism in the next section.

From the current section we can draw two conclusions about theories of mnemonic justification. Given the unmatched ability of a preservationist condition to account for our historical intuitions about justification, I conclude that PRES is a necessary part of a theory explaining the justification of memory beliefs. However, given the failure of a preservationist condition to account for our time-slice intuitions I conclude that PRES on its own is insufficient as a theory of mnemonic justification.

Section 3

Having established that a preservationist condition is necessary but not sufficient for an adequate account of the justification of memory beliefs, we turn now to the other piece of the puzzle. In this section, I examine several widely-held positions on justification and consider whether any of those can provide a good account of our time-slice intuitions. I argue that none of the traditional theories are up to the task. In Section 4 I present a theory that does a better job.

3.1 Reliabilism

Let us begin with reliabilism. Essentially, the theory states that a belief is justified if it is the product of a reliable belief-forming mechanism or process. I shall give only a brief account of the problems that I take to undermine reliabilism.[34] First I note some general problems for reliabilism, and then proceed to specific problems that reliabilism has with respect to the justification of memory beliefs.

Possibly the most famous general problem for reliabilism is Bonjour's clairvoyance counter-example.[35] However, since that example comes to bear on a later part of this paper, I shall save that discussion for the next section.

Another difficult general problem for reliabilism is due to Huemer.[36] He argues that reliabilism cannot adequately deal with cases of the following form: a subject, S, holds two beliefs, p and q. It seems to the subject that she has the same amount of evidence for each of the two beliefs. That is, from S's perspective, the beliefs seem to be on a par epistemically speaking. Now it turns out that p is formed by some reliable process and q is not. Assume that S reports reliably on her beliefs. On these specifications, reliabilism must rule that S can justifiably make the following report: "It seems to me that p and it seems to me that q. Epistemically, I see nothing to choose between the two. However, I hold p and I reject q". Surely, this is an absurd thing to say.

The point is easier to grasp when we flesh out the example. Consider Huemer's Clairvoyant Brain. Susan has two ways of forming beliefs: apparent sensory perception and clairvoyance. At a particular moment, Susan seems to see a dog in the field in front of her and she seems

[34] In fact, I think that the conditions that I espouse in Section 4 are consistent with a nuanced version of reliabilism. Here, discussion is limited to a simple version of reliabilism.
[35] (BonJour, 1985)
[36] (Huemer, 2006)

clairvoyantly aware of a pink unicorn in a far off land. As far as the strength of her evidence goes, Susan does not rank one belief above the other. She has always had both sensory and clairvoyant experiences. As far as she can tell both faculties are equally reliable. As it turns out, Susan is a brain in a vat. Her perceptual appearances are completely unreliable; there is no dog in front of her, and indeed there is not even a field. She is also genuinely clairvoyant; the pink unicorn exists in exactly the far off land that she pictured.

Now, let's assume that Susan can accurately report how things appear to her and what she believes. She says the following:

> *Absurd Speech*: I seem to be aware of a dog, just as I seem to be aware of a unicorn. These two experiences seem equally reliable to me, and in general, seem alike in all epistemically relevant respects. However, I believe that there is a unicorn, and I do not believe that there is a dog. I have no reason to think that the unicorn experience is any more likely to be accurate than the dog experience; I just accept the content of the one and not the other, for no apparent reason.[37]

This is an absurd thing to say. Susan cannot consistently accept that there is a unicorn in a far off land and that there is not a dog in front of her. However, the reliabilist must rule that Susan's seemingly arbitrary decision about what to believe aligns with what she is justified in believing. After all, Susan's belief regarding the unicorn is reliably formed and her belief regarding the dog is not. If aligning one's beliefs with what one is justified to believe is not rational, nothing is. So, the reliabilist must endorse the claim that the Absurd Speech is rational. This absurd conclusion is grounds for us to reject reliabilism.

I think that the reliabilist has a very effective response. The Clairvoyant Brain example does not undermine reliabilism since reliabilism is inaccurately represented. The target of the case is a mere caricature of the genuine reliabilist position.

Recall Goldman's distinction between strong and weak justification. Essentially, weak justification is meant to cover epistemic culpability, and strong justification is meant to elucidate the connection between a subject's belief and the truth. Strong justification requires a God's-eye perspective, and it is this with which reliabilism is concerned.

In focussing on Susan's utterance, the Clairvoyant Brain case surreptitiously changes the game. In the example, our focus is narrowed to a personal perspective; we are required to think about what Susan can and cannot rationally say. However, this perspective is apt for the investigation of weak justification not the investigation of strong justification. In contrast, the reliabilist does

[37] (Huemer, 2006, p. 150)

not claim to account for what Susan might rationally say. Remember that the reliabilist would endorse the claim that Susan's belief could be justified unbeknownst to her. So, the reliabilist will argue, to hold up Susan's utterances against him is to miss the main thrust of his position.

This response highlights the difficulty that the internalist will have in impugning reliabilism. However, it does not halt our progress and in fact, it is instructive. While the reliabilist may claim that the Clairvoyant Brain objection has missed its mark, the example does establish a pertinent epistemic fact:

> there cannot be a pair of cases in which everything seems to a subject to be the same in all epistemically relevant respects, and yet the subject ought, rationally, to take different doxastic attitudes in the two cases - for instance, in one case to affirm a proposition and in the other to withhold.[38]

The reliabilist cannot account for this fact. Now while the reliabilist may reply that it is not an epistemic fact that his theory *tries* to account for, it is clear nonetheless that such cases are important for a theory of memory beliefs.

To see why, we can reconsider the examples that were problematic for preservationism. There, the time-slice perspective is what caused the trouble. Consider this very simple case:

> [Billy] I seem to remember that Billy Pilgrim was kept in a zoo on Tralfamadore. None of my other beliefs lend any support to this claim. None of my other beliefs undermine it either. All I have got to go on is my apparent memory. I hold the belief that Billy Pilgrim was kept in a zoo on Tralfamadore.[39]

Ought I to retain my belief? Or ought I to discard it? Intuitively, I think that we would agree that I ought to retain the belief. This intuitive judgement speaks to the claim that the belief is justified at the time I appear to remember it.

Preservationism and reliabilism face the same difficulty in accounting for that judgement. An explanation of why it is true requires that we adopt a time-slice perspective. However, neither theory has the apparatus to adopt such a perspective and so neither theory is able to account for the justification in such cases.

So, while the Clairvoyant Brain argument may fail to show that reliabilism is positively false, it does demonstrate that reliabilism is not apt to account for our time-slice intuitions. On these grounds, we continue our search by considering standard internalist positions.

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[38] (Huemer, 2006)
[39] You might equally consider the Damien1/Damien2 case

3.2 Evidentialism, Coherentism and Foundationalism

The most obvious internalist candidate for a second criterion in our theory on mnemonic justification is evidentialism. I aim to show that evidentialism cannot adequately account for the justification of memory beliefs at a time. I shall also use my examination of evidentialism as a springboard to make several points about coherentism and one particular type of foundationalism.

Evidentialism is a position on epistemic justification that can be broadly stated as such:

> A belief p is justified for subject S if the strength of S's confidence in p is proportional to the evidence that S has for p.

We should note that evidentialism is different in kind to epistemological theories like foundationalism, coherentism and Haack's foundherentism. While those theories tell us about the structure of epistemic justification, evidentialism tells us what sorts of thing count as justifiers - the evidence that one has. The components of one's evidence might relate to each other in different ways and evidence might be said to have different structures. So, evidentialism broadly construed is compatible will all three of those theories. As we will see, more specific evidentialist theories tell us more about what counts as evidence and in doing so evidentialist theories begin to become more apt for foundationalist or coherentist readings.

In this section I investigate whether or not evidentialism can account for the justification of our memory beliefs. So the key question here is this: What evidence do we have for our memory beliefs? I explore possible evidentialist answers.

Broadly, these answers fall into two categories; those yielded by two types of evidentialist theories - doxastic and non-doxastic evidentialism. Doxastic evidentialists take evidence to be limited to beliefs held by the subject that support a certain proposition. Non-doxastic evidentialists broaden the class of possible evidence to include non-beliefs - non-doxastic phenomenological states like perceptual seemings. So, to dispense with evidentialism per se as an account of mnemonic justification we must illustrate the insufficiency of doxastic evidentialism (DE) and non-doxastic evidentialism (NDE) in turn.

3.2.1 Doxastic evidentialism

The general problem for doxastic evidentialism is straightforward. Assuming that evidence is merely made up of beliefs, there seem to be many cases in which a subject's memory belief is

uncontroversially *justified* despite an apparent lack of evidence available to the subject. These counter-examples illustrate the *problem of forgotten evidence*.[40] One such counter-example might run as such:

I believe that Nelson Mandela was released from prison in 1990. I believe it strongly. If I had to put the claim forward as a pub-quiz answer, I would do so without hesitation. Ordinary speakers would surely say that I *know* the year of Mandela's release. Less boldly, epistemologists would say that I am *justified* in my belief. However if you pressed me for evidence supporting this belief I would not be able to give you much. I don't remember where I learned it and I can't point to any evidence for it being the case. It's not just that this doxastic evidence is inaccessible to me. I don't even have the beliefs that would count as evidence at all. So, despite the fact that I straightforwardly seem justified in holding that Mandela was released in 1990, I currently have very little evidence for the claim.[41] The strength of my belief does not fit the evidence that I have, but it seems like it needn't in this case. So, believing justifiedly is not merely a matter of believing in proportion to the (doxastic) evidence that I have.

These easy-to-manufacture cases of forgotten evidence seem to ground a quite convincing case against evidentialism; however, the game is not yet up. What I have said so far about doxastic evidentialism relies on treating evidence as limited to beliefs that directly support a claim. Having so limited the discussion, I have considered only first-order evidence. At this point the evidentialist has another move to make; he could appeal to second-order doxastic evidence.

Most simply, second-order doxastic evidence consists of beliefs that the subject holds about their memory. For example, I might hold that **I remember that Mandela was released in 1990** or **I seem to remember that Mandela was released in 1990**. It might be argued that these types of claim provide evidence in the case where we have forgotten our original, first-order evidence. So, the doxastic evidentialist has a means to account for the fact that the remembered belief remains justified in those cases.

While this line might seem promising, it will not save the doxastic evidentialist. There are at least two problems here. The first problem that McGrath points out is something like a regress problem: When presented with second-order claims, we might question their validity as

[40] (Harman, 1986, p. 41). Audi (1995, pp. 33-34), mentions similar problems.
[41] Of course I have some evidence for the claim that Mandela was released in the early 1990's: I hold that he was elected president in 1994 and that he must have been released before then. I believe that the Apartheid government was in power but under increasing international pressure in the 1980's. However, this evidence provides support for the broad claim that Mandela was released in the early 1990's not the specific claim that he was released in 1990. The evidence that I just mentioned supports equally the claims that he was released in 1991 or he was released in 1992. On that evidence I am not justified in specifying which, but, in fact it seems that I am.

evidence by wondering if and how those second-order claims are justified. Asking what evidence I have for my belief **I seem to remember that Mandela was released in 1990**, we are lead down a dead end. I cannot point to anything that could possibly count as doxastic evidence for the claim. So, it seems that the doxastic evidentialist cannot account for the justification of second-order doxastic evidence. Since unjustified evidence is no evidence at all, the doxastic evidentialist still cannot account for the justification of beliefs in cases of forgotten evidence.

Again, I think that the doxastic evidentialist has a response; if this line of argument does parallel the regress argument then McGrath has created a straw man of his opponent by insisting that the chain of evidence go back in such a linear fashion. If we take coherence to be a plausible way to stop the epistemic regress then we should allow coherence to play a role in an evidentialist picture. It is worthwhile to think about what this picture would look like.

On a coherentist picture of doxastic evidence, it would be legitimate for some belief, B1, to count as evidence for another belief, B2, while B2 simultaneously counts as evidence for B1. In our memory case **i) I seem to remember that Mandela was released in 1990** counts as evidence for **ii) I remember that Mandela was released in 1990** which in turn entails my belief **iii) Mandela was released in 1990**. Now, the previous objection can be rebutted if ii) and iii) constitute evidence for i). However they do not. So the coherentist picture does not help in that respect; but there is yet another option. If there are other beliefs with which i) coheres, then the evidentialist might have some way of showing that belief i) is in fact justified.

This leads us to two questions: What would those beliefs be? And, does the coherence relation genuinely provide evidence (support for) a particular belief? Neither of these questions has a straightforward answer.

Fortunately, I think we needn't answer these questions in order to refute doxastic evidentialism. There is another line of objection that undermines claims that appeal to second-order doxastic evidence. To reiterate; second-order doxastic evidence is comprised of beliefs that we have about our faculty of memory and beliefs that gain their epistemic status from beliefs that we have about our faculty of memory.

Given its nature, we can see that an evidentialist appeal to second-order doxastic evidence is going to be overly demanding. There are many cases in which a subject seems to have a justified memory belief, but clearly lacks any second-order doxastic evidence. Take the memory beliefs of young children, for example. Many of them are not even capable of holding second-order doxastic beliefs, yet surely their memory beliefs are justified.

So, doxastic evidentialism seems unable to meet the challenge of forgotten evidence and it seems more plausible that our evidence is not merely a matter of propositions that we believe. Rather, 'evidence' should encompass a broader class; one that includes some non-beliefs. The most natural addition in this respect is seemings, both perceptual and mnemonic.

3.2.2 Non-doxastic evidentialism

We will now turn to the evidentialist claim that phenomenological memory seemings provide evidence for memory beliefs.[42] This is an essential claim of one plausible non-doxastic evidentialist position on the justification of memory beliefs.

In order to get a grip on this type of non-doxastic position, we must be clear about what it is to have a 'mnemonic seeming'. This is simply a phenomenological experience that goes along with having a memory belief. To illustrate the point, try to recall which country is directly east of Chile. The first thing that comes to mind (at least for me) is a mental image of South America. Of course, this image is rough but a phenomenological experience is certainly part of my remembering that Argentina is directly east of Chile. Because the justification for a memory belief is founded upon its accompanying experience, this type of theory is what Senor calls 'experiential foundationalism'. [43]

So, we see that evidential foundationalism relies on an enriched metaphysical conception of memory beliefs. The idea here is that memory beliefs are constituted of a proposition, the relevant propositional attitude *and* a 'memory seeming'.[44]

The idea is that we can draw an analogy with one standard account of perceptual justification. Consider my belief that there is a computer screen in front of me. It might be argued that this belief is justified in virtue of the fact that I am presently having a perceptual experience of the computer screen; I can see it. This experience justifies my belief. Now consider a mnemonic analogue. Think about my belief that my dining room walls at home are purple. When I am conscious of this memory belief I certainly have an associated image. So, the theory says, if the account is good for perception, surely the same will hold for memory. I am justified in holding my belief about the colour of my walls in virtue of the fact that I have a memory seeming (or image) to that effect.

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[42] I discuss non-phenomenological appearances in the next section. I exclude them from my discussion of evidentialism because it is not clear that non-phenomenological appearances would count as evidence on traditional evidentialist accounts.
[43] (Senor, 2009)
[44] Pollock (1986, pp. 51-52) seems to hold this view. However, we might interpret Pollock as embracing what I call a non-phenomenological account of memory seemings.

The main objection to this theory is metaphysical rather than epistemological. It seems that we have reason to think that the evidential foundationalist relies on a mistaken understanding of how memory works. While the phenomenology that they ascribe to memory beliefs is undeniably common it is not undeniably ubiquitous. That is, having 'memory seeming' does not seem to be a necessary condition of having a memory belief.

Consider this case: I am teaching a first year class and one of my students spends the entire lecture reading *Twilight*. I only notice this half way through the class and ask if he did the same in the previous lecture. With barely a glance he answers "Yes" and carries on reading.[45] Here the student seems to have a memory belief with the propositional content 'I read *Twilight* yesterday in class' yet it is unclear that he has any related memory seeming at all. In fact it seems as if his phenomenological states are mostly concerned with the soap-opera antics of several fictional vampires.

This type of example gives us some reason to think that not all memory beliefs are accompanied by the phenomenology claimed by the evidential foundationalist. And if such phenomenology is not necessarily present in memory beliefs then it can hardly form their justificatory grounds. And so, the most plausible line of non-doxastic evidentialism fails to account for the justification of memory beliefs.

3.2.3 Other lessons from evidentialism

At this point, we have ruled out evidentialism; however, the considerations of this section offer us insight into other aspects of the epistemology of memory.

From our consideration of doxastic evidentialism, we learn about the main problem for coherentist accounts of memory: the problem of forgotten evidence. If I come to believe p, as I forget the beliefs which support p, I lose a measure of coherence. In fact, if I do enough forgetting, there will be very little for my belief p to cohere with. Think back to my 'Mandela' case. There I had a rather isolated belief. The coherentist doesn't seem to be able to account for the common-sense claim that my Mandela-belief is justified and this is all the worse for coherentism. My feeling is that the problem of forgotten evidence is not as bad for coherentism as it is for doxastic evidentialism and I will return briefly to coherentism in Section 5.

For now, we might wonder if forgotten evidence is also a problem for foundationalist accounts. In some ways it is. If evidence forms the justificational foundation for a belief p then when that evidence is forgotten, p is without foundation. So, a foundationalist account must find some new

[45] This is similar to the case given in Senor (1993, p. 459)

foundation for p. Our consideration of non-doxastic evidentialism is an attempt to do just that. Evidential foundationalism proposes that memory seemings provide old beliefs with new foundations when their old ones have been forgotten.

However, we saw that phenomenological memory seemings will not help because they do not necessarily accompany memory beliefs. So, a foundationalist solution cannot appeal to a straightforward analogue of perceptual justification to solve the problem of mnemonic justification. If we want to pursue a foundationalist line we have to take better stock of what resources are given to us by a plausible metaphysical account of memory.

Dispositional foundationalism

One interesting metaphysical feature of memory beliefs is this. Even when we have a memory belief without an accompanying phenomenological memory experience, we are *disposed* to have that experience. So, one line for the memory foundationalist is to claim that the disposition to have a phenomenological memory experience acts as a justifier for our memory beliefs.

This dispositional treatment faces a few problems. Firstly, we should consider how we read the claim that the disposition is a justifier for a memory belief. If we argue that a disposition causes a phenomenological seeming and that seeming confers justification, we are in immediate trouble. The previous point was just that the some memory beliefs occur without such seemings. On this picture they would have associated dispositions, but those dispositions do not do the epistemic work. An insistence that the seemings (not the dispositions) do the work just leads us straight back to the previous problem.

So a dispositional foundationalist must claim that the disposition itself does justificatory work. But this leads to a different problem. I can see how appearances plausibly act to non-inferentially justify beliefs and it is very clear that beliefs can stand in an inferential justificatory relation to other beliefs. However, it is not very clear that the relation between a disposition and a belief can be justificatory. I don't wish to rule on the matter here, but the dispositional foundationalist must offer us an account of how and why a disposition can operate like an appearance.

Finally, even if we accept that dispositions can be justifiers, there is yet another problem. We can start with this question: Why are those memory beliefs justified? On the dispositional foundationalist account the answer is that they are justified because they are disposed to produce memory seemings - the kind of seemings that ordinarily play a role in foundational accounts.

One objection to such a claim is that it is not clear that every memory belief is disposed to produce in us the necessary kind of phenomenological appearance. Consider your beliefs about the claim that 2 + 2 = 4. Your memory belief in that regard disposes you to certain things. You are disposed to assent to the claim; you are disposed to picture the numbers; you might even be disposed to picture the combination of two sets of concrete objects (say, jelly-tots). However, you will not be disposed to have an image of the abstract concepts involved - the number, two; the number four; the operation of addition. Abstract objects cannot be pictured. Where memory references an introspective or abstract intellectual belief it is not clear that the right kind of related phenomenological appearances exist. Things seem to be a certain way, but that seeming needs not be related to a kind of image. Since memory beliefs are not all disposed to produce phenomenological seemings, an appeal to dispositions cannot save traditional foundationalism.

I do not mean these points to decide the issue. I just want to show that a dispositional account on mnemonic justification faces serious problems.

So we see that, metaphysically speaking, the foundationalist is not left with much. However, there is at least one more place to turn. Next I examine a type of foundationalist position that does not rely on phenomenological memory seemings. I turn to a type of theory that puts weight on seemings that occur without related images. Phenomenal conservatives think that non-phenomenological appearances provide prima facie non-inferential justification for holding that belief. In my next section I suggest that a conservative condition can adequately account for the justification of memory beliefs at a time.

Section 4

Having now rejected several possibilities, my aim in this section is to argue for the second part of what I think is the correct theory of the justification of memory beliefs. I argue that the best way to account for memory beliefs is to accept a historical perspective on memory beliefs and to accept the claim that forms the core of Michael Huemer's Phenomenal Conservatism.[46] My position is essentially the position that Huemer adopts in *The Problem of Memory Beliefs*, however, my defence of this position is different to Huemer's in at least one important respect. I say more about the phenomenal conservative portion of the theory than Huemer does in his earlier paper and I defend it against objections that Huemer does not. I also wield the theory of memory beliefs against a general objection to phenomenal conservatism.

I do not intend to accept Huemer's Phenomenal Conservatism wholesale. For instance, I take no view on whether PC comprises the only source of foundational justification. Also, I do not exclude the possibility of externalist readings of my theory. In the final section, I shall make clear the narrowness of my view and its connections to related theories.

My defence will proceed as follows: First, I shall explain the conservative position. Then I shall consider the results that this theory produces in the problematic cases that arose in the earlier sections of this paper. Next, I shall consider problems specific to my theory. Finally, I shall sum up the reasons for accepting the theory.

4.1 Huemer's Phenomenal Conservatism

Michael Huemer argues that appearances are the only source of foundational justification. He calls this position Phenomenal Conservatism and it is characterised by the following principle:

> **PC:** If it seems to S that p, then, in the absence of defeaters, S thereby has at least some degree of justification for believing that p.[47]

I endorse PC.[48] In the context of this paper it is important to see how PC deals with memory beliefs. As I see it, our faculty of memory is the source of certain appearances. When I recall that

[46] (Huemer, 2001) and (Huemer, 2007)
[47] (Huemer, 2007, p. 30)

I had toast for breakfast, I have a specific seeming: it seems to me that I had toast this morning.[49] If PC is correct, this seeming provides defeasible prima facie justification for my belief that I had toast for breakfast.

But now, this picture looks a lot like McGrath's account of non-doxastic evidentialism (NDE) that was rejected in the previous section.[50] On that account, quasi-perceptual states provided justification for perceptual states. However, the two accounts are distinct. The ' appearances' of PC are not quasi-perceptual states and do not fall prey to the same objections as the states involved in NDE.

4.1.1 What are appearances?

Here the obvious question must arise: What are appearances?

Huemer answers this question directly:

> I take statements of the form ‘‘it seems to S that p’’ or ‘‘it appears to S that p’’ to describe a kind of propositional attitude, different from belief, of which sensory experience, apparent memory, intuition, and apparent introspective awareness are species.[51]

On PC, appearances (or seemings) are propositional attitudes rather than quasi-perceptual states.[52]

To understand the difference let us return to McGrath's problem for NDE. He claimed, rightly that not all memory beliefs are accompanied by the type of phenomenological experience that would obviously count for evidence. Those experiences are things like the experience of boxy-redness that I have when I see a red box. Experiences like that are simply not a part of most memory beliefs. A theory that relies on those kinds of experiences as the only fundamental justifiers cannot account for the justification of memory beliefs.

I want to offer a theory that relies on a different kind of appearance, a type that is not quasi-perceptual, a type that does not posit a certain image. That is, I lean on a type of experience that

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[48] By which, I mean that I think that the conditional PC is a true proposition. I do not mean that I endorse further claims like "All justified beliefs must have justification traceable to justification based on an appearance or seeming".
[49] I intend 'recall' to be non-factive, unlike 'remember'.
[50] (McGrath, 2007, p. 10)
[51] (Huemer, 2007, p. 30)
[52] Cullinson (2010) gives a more thorough treatment to the question and concludes that appearances are irreducible propositional attitudes. We needn't take a view on reducibility here.

is not phenomenological in the ordinary sense.[53] Primarily I need to establish that such appearances exist.

I want to avoid the tight perceptual analogue and consideration of perceptual seemings will only serve to confuse the issue. So I shall begin by considering our faculty of rational introspection. Take a standard case: I know that '2 + 2 = 4' because when I apprehend the meanings of the symbols it is clear to me that the statement is true - I rationally intuit that two plus two *must* be four.

Now, one obvious line for establishing the existence of non-perceptual appearances becomes apparent. I might assert that I believe the truth of '2 + 2 = 4' on the basis of a non-perceptual appearance. Clearly, there is nothing like an image that accompanies my consideration of the proposition, so any appearance must be non-perceptual. Of course, in specific instances, we might have quasi-perceptual appearances when we use our faculty of introspection. For instance, I might imagine the shape of the numerals '2' and '4' and the symbols '=' and '+'. These images are not typical of introspection and are merely incidental.

This simple line does not decide the issue; an opponent of the view has a good retort. They could argue that we have no reason to believe that cases of rational intuition involve both a belief *and* an appearance. When we analyse the case, it is clear that we come to believe the proposition, but there is little to indicate that we do so on the basis of an appearance. A principle of parsimony would lead us to favour the view that beliefs are the only propositional attitudes present in cases of rational intuition.

The proper response to this is to give examples in which a subject involved in rational intuition has seemings that are distinct from their beliefs. I shall offer two cases.[54]

Firstly, imagine a Cartesian case. You are systematically deceived by an evil demon. This deception goes so deep that you are even misled about the truths of simple mathematical equivalence. It seems to you that 2 + 2 = 3. In the evil demon world that statement pulls you as strongly as 2 + 2 = 4 pulls you in this world. Now we can add an extra element to the standard picture. You know that you are being misled. The result is that you feel the pull towards accepting 2 + 2 = 3. However, even though you don't understand how it could be false, you accept that it is in fact false. In this case you don't believe a proposition even though it seems to

[53] This makes Huemer's it slightly confusing that Huemer's theory is called *Phenomenal* Conservatism. 'Appearances' in my terminology are, however, phenomenological in a broad sense: They are a matter of how things seem. This and the distinction between Huemer's theory and *doxastic* conservatism account for his usage.

[54] These cases follow the same structure as the cases that Huemer uses to establish that beliefs are not appearances. The key difference is that my cases involve introspection rather than perception.

you that the proposition is true. Furthermore, that seeming is dissimilar to perceptual seemings insofar as there is no associated image. So we have reason to believe that introspection involves both beliefs and appearances.

If you are not convinced that you could be deceived about the appearance of necessary truths, consider a second case. You are presented with the Monty Hall problem.[55] Along with the majority of people to whom the case is put, you think that switching doors does not change your probability of winning the prize. It seems to you that once Monty Hall has opened a door your chances of winning are 50-50 no matter which door you choose. Now, the statistician who put the problem to you explains that, in fact, you would be best served by switching. You fail to follow when he shows you the reasoning behind that claim. It still seems to you that the probabilities are 50-50, however you understand that the statistician knows better and on those grounds you trust his solution. Here you have an intellectual seeming. There is no quasi-perceptual image associated with how the probabilities seem to you in this case. Of course, your belief does not have the same propositional content as that seeming. You believe that you should switch. So, again, it looks like our faculty of rational introspection involves both beliefs and distinct appearances.

In the case of memory, a proponent of PC would say that it could seem (mnemonically) to S that p without requiring that S have a quasi-perceptual experience of p.[56] Given the model above, we can easily think of an example. Imagine you, Simon and I have just come to the end of a yearlong reading group. Reminiscing, I mention that I particularly enjoyed Kripke's response to Russell's theory of names (in which he mentions that it has a defect common to all philosophical theories: it's wrong). Of course, you and Simon mention that Kripke was referring to Searle's cluster concept theory. While I accept your correction, I can't shake the feeling that Kripke was talking about Russell. It seems to me, mnemonically, that Kripke was talking about Russell but I believe that he was talking about Searle.

I have used these cases to establish that there are appearances lacking the images associated with quasi-perceptual appearances. For the remainder of this paper I use 'appearances' to refer

[55] The problem runs as follows: You are a contestant in Monty Hall's game show. There are three doors. Behind one door is a prize. Behind the other two are goats. The prize and goats are randomly placed. Monty Hall knows the placement. You select a door. Monty is then required to open one of the two doors that you have not selected. He must reveal a goat. You are now given the opportunity to stay with your original choice or switch to the other unopened door. Do you stay or switch? It seems to most people that there is no advantage to switching. In fact there is. Switching wins the prize two-thirds of the time.

[56] This means that PC avoids the main objection to NDE. Recall my example about the student who is reading in class. When he looks up to report a memory belief, it is quite clear that he has no quasi-perceptual experience: he does not picture being in class yesterday. However, it seems reasonable to think that it seems to the student that he was not in class. He has a non-perceptual appearance to that effect. The student's reported belief at that time is justified in virtue of that non-perceptual appearance.

(as Huemer does) to propositional attitudes, different from beliefs, of which sensory experience; apparent memory; intuition; and apparent introspective awareness are species.[57]

4.1.2 A note on the historical perspective

PC forms one component of my view on the justification of memory beliefs. However, my theory involves another important component. I suggest that we adopt a broader historical view of justification. This is motivated by the fact that a time-slice view on justification is likely to confuse certain issues in this domain. Acknowledging a historical perspective serves to ameliorate the harms of such a position. At the very least, understanding the consequences of the different approaches will be instructive.

4.2 Mnemonic Phenomenal Conservatism

Having explained each of the elements, I can now offer a precise statement of the view that I suggest in this paper. Let us call this view Mnemonic Phenomenal Conservatism (M-PC). It is the conjunction of two claims and can be characterised as follows.

M-PC:

c) PC**:** If it seems to S that p, then, in the absence of defeaters, S thereby has at least some degree of justification for believing that p; and
d) PRES: For any subject, S, his memory belief p is justified all-things-considered at T2 iff p is justifiedly formed by S at an earlier time, T1.

The primary motivation for this view is that by holding it, we can account for the justification of memory beliefs better than if we were to hold any of the other standard theories.

4.2.1 Cases

We can now begin to test the theory. I shall start with applying M-PC to the problem cases of the earlier sections. There are at least two reasons to do this: Firstly, if M-PC cannot deal with the previous problem cases then it is a non-starter as a theory of mnemonic justification; secondly, considering these examples will give us some insight into what sorts of features might count towards a belief being ultima facie justified. Having tested the theory against the previous problem cases, I shall consider objections aimed specifically at PC.

[57] We might ask: Why can't these seemings be evidence? If so, this would constitute another line of retort for the evidentialist. I'm not sure whether appearances of this kind can or cannot be counted as evidence. My hunch is that they can. I shall deal with issues surrounding the compatibility of PC with other theories of justification in a later section.

Lackey's Cases

Lackey provided us with two cases. In each case, her goal was to undermine preservationism (characterised by PVM). She provided purported examples in which a belief was unjustified at the time that it was formed (T1) and justified when it was later recalled (T2). That feature is not in itself problematic for PC but examining the cases brings out an important feature of the conservative view.

Lackey's first case involved Arthur, who, failing to keep up with news reports to the contrary, formed the belief that his mayor had accepted a bribe (at T1). Later, at T2, when news outlets changed their story, Arthur maintained his belief, still having neglected all reports on current affairs. Lackey thinks that Arthur was unjustified in his belief at T1 and justified at T2.

M-PC is clear on Arthur's retention of the belief. At T2 it seems (mnemonically) to Arthur that his mayor is guilty of taking bribes. There are no defeaters. In the parlance of M-PC, Arthur is justified in retaining his belief at T2.

The justificatory status of Arthur's belief at T1 is a more complicated issue. Whether or not Arthur forms his belief justifiedly is controversial. It depends on our characterisation of defeaters.[58] Lackey assumes that defeaters can be normative. That means that propositions that Arthur does not believe, and that don't even appear to Arthur, can serve to undermine the justification of some belief that he does hold. Moreover, Arthur could be unaware that he should be apprised of further information.

Embracing the internalist bent of M-PC, we might rule out Lackey's normative defeaters since they are not states that the agent has in any appropriate sense. On that view, Arthur's belief at T1 is justified. Therefore, the judgement that M-PC makes in this case diverges from Lackey's assessment.

This disagreement hints at a line of objection. An opponent might argue that M-PC fails to take proper account of Arthur's epistemic responsibilities. In considering the belief at T1 justified, PC ignores the epistemic failing that Arthur exhibits in not being even minimally aware of current affairs.

If there are good independent reasons to incorporate epistemic responsibilities into our theory of justification, they do not stand opposed to M-PC. A defender of M-PC could plausibly argue

[58] For the purposes of this paper I do not want to commit myself to any particular account of what defeaters consist in. Let it suffice to say that I am disinclined towards Lackey's account. Although that opinion colours the next few paragraphs, it has no bearing on the overall point of this paper. If you are inclined to Lackey's account, then you can happily believe that Arthur's belief was unjustified at T1. Such a view is not inconsistent with my position.

that Arthur has neglected an epistemic duty. However, that neglect is a broad epistemic failing that needn't impact our current verdict in Arthur's case. Alternatively, a full theory of defeaters might incorporate epistemic responsibility. Holding that theory along with M-PC would simply change the verdict on Lackey's case. It would not serve to undermine M-PC.

Many such lines are possible. In each case the point is this: The concept of epistemic duty is consistent with M-PC (but not entailed by it). So, we see that the verdict on Lackey's first case does not undermine M-PC. This consistency indicates an important feature of M-PC: It is not a complete theory of justification; there are gaps to be filled. I shall say more about those later.

For now, let us turn to Lackey's second case. Remember Nora. She originally formed the belief *Hitler was a Christian* (H) on the basis of testimony from an atheist (at T1). Having antecedently come to believe *All testimony from atheists is unreliable* (A), it looks like Nora has inconsistent beliefs at T1. We ought to say that Nora's belief H was formed unjustifiedly. She had a defeater; an established belief, A, made it unreasonable for her to believe H.[59]

At a later time (T2) Nora still believes H but has forgotten A . Lackey claims that this renders Nora's belief H justified at T2, since H is no longer defeated by A.

This conclusion makes sense if we adopt a time-slice internalist view point. After all, what is Nora to do? She ought to retain the belief that Hitler was raised a Christian.

However, someone inclined to take a broader historical view would disagree. They would wonder how a belief formed unjustifiedly could be rendered justified by the fact that the subject forgot the evidence that she formerly had.

With these points in mind, M-PC's verdict should be obvious. All things considered, the belief is unjustified, since it was formed unjustifiedly.

From these considerations we can see how M-PC handles justification switch cases in general. Where a belief is formed unjustifiedly that belief cannot be considered justified, all-things-considered, unless the subject comes to have better reasons for believing p after having formed it unjustifiedly. However, M-PC is still able to maintain that it is epistemically appropriate for us to retain unjustified beliefs under certain specific circumstances.

So M-PC allows us to consistently say that S is unjustified in **holding** p, but S is justified in **retaining p at a given time**. It does so by acknowledging that epistemic judgements are made

[59] The case is complicated by the fact that it is plausible that Nora has defeaters for her belief that *the testimony of Atheists unreliable.* If that is so, we need a fuller description to decide whether Nora is justified on PC grounds. We can safely ignore this complication.

from different perspectives. In this way, M-PC separates our historical intuitions from our time-slice intuitions. It ably handles both. This is a great virtue for a theory of justification.

Forgotten Evidence

Finally recall cases of forgotten evidence. My example was of the belief I have that Nelson Mandela was released from prison in 1990. In that case, I had formed the belief on the basis of evidence at an earlier time (T1) and recalled the belief at a later time (T2). However, at the later time, I had forgotten almost everything else that I believed relating to that claim: I had forgotten the evidence upon which I had formed the belief.

My guess is that intuitions are fairly ubiquitous in these kinds of cases. Everyone seems happy to grant that this belief is justified. However different accounts will give us different reasons to think this.

The standard preservationist line would hold that the belief is justified purely because it was justifiedly formed. The standard reliabilist line would highlight the reliability of the process that formed that belief and the process by which I recalled it. Holders of those accounts standardly cite such cases as problematic for evidentialist accounts (and time-slice, internalist views in general): They contend that the belief is obviously justified, but evidentialism cannot account for that fact.

M-PC maintains the spirit of evidentialism (see fn11, p4) and deals with these types of cases simply and easily. Forgotten evidence cases stipulate that a belief is justified at T1, so we need only focus on T2. According to M-PC, the recollection of a belief p involves an appearance to the effect that p. This appearance confers prima facie justification. Therefore, in the absence of defeaters (and these cases specify none) my belief is justifiedly retained at T2 and the belief is justified all things considered. Having accounted for our intuition in these cases, we can see that forgotten evidence is not a problem for M-PC.

So, while we are yet to see any arguments directly for or against PC, it should be clear that it handles all of the previous difficult cases. Unfortunately, that is not to say that there are no cases that provide substantial problems for PC. I turn next to just such cases.

4.3 Problems for M-PC

4.3.1 Clairvoyant cases

John DePoe argues that Bonjour's famous clairvoyant example is problematic for Huemer's Phenomenal Conservatism.[60] Essentially, DePoe argues that the conditional, PC, must be false. At least two problems are said to arise from his clairvoyant example: Firstly, DePoe thinks that PC is too liberal - that is, PC leads us to interpret certain unjustified beliefs as justified; and secondly, the example is said to show that adopters of PC cannot accommodate fundamental internalist intuitions. These problems are connected and my consideration of one shall bear directly upon the other.

Here is the Bonjour's famous case:

> [Case 1]: Norman, under certain conditions which usually obtain, is a completely reliable clairvoyant with respect to certain kinds of subject matter. He possesses no evidence or reasons of any kind for or against the general possibility of such a cognitive power or for or against the thesis that he possesses it. One day Norman comes to believe that the President is in New York City, though he has no evidence either for or against this belief. In fact the belief is true and results from his clairvoyant power, under circumstances in which it is completely reliable. (1985, p41)

Bonjour advances this case as a counter-example to reliabilist theories of justification. It's efficacy as a counter-example relies on two claims:

i) Norman's belief is uncontroversially unjustified; and
ii) Reliabilism entails that Norman's belief is justified.

The reasons advanced in support of the first claim are straightforward. Norman has no reason to believe that the President is in New York City. An unreasonable belief is, uncontroversially, an unjustifed belief.

Whether this is a counter-example to reliabilist theories is not at issue here. DePoe's point is merely that committed internalists must think that Norman is unjustified in his beliefs. Granting that, we can think of a similar example, but one that has PC in its sights rather than reliabilsm. Following Bonjour as closely as possible, DePoe's example looks like this:

[60] (DePoe, 2010), (BonJour, 1985, p. 41)

> [Case 2]: Norman, under certain conditions which usually obtain, is a completely reliable clairvoyant with respect to certain kinds of subject matter. He possesses no evidence or reasons of any kind for or against the general possibility of such a cognitive power or for or against the thesis that he possesses it. One day Norman's clairvoyant powers cause in him an appearance: **it seems to Norman** that the President is in New York City, though he has no (other) evidence either for or against this belief. In fact the belief is true and the **appearance** results from his clairvoyant power, under circumstances in which it is completely reliable.

Again, let us specify the conditions under which this is an effective counter-example:

I) Norman's belief is uncontroversially unjustified; and
II) PC entails that Norman's belief is justified

Let us begin with the second claim. This seems true. Since Norman has an appearance and no defeaters, PC must grant that Norman's clairvoyant beliefs are justified. Claim II is simply not in dispute.

What about Claim I? DePoe argues that Norman's beliefs are unjustified in the second case for precisely the reasons that they are in the first case. Norman has no good reason to hold the clairvoyant beliefs that he does. This is to take an internalist line. So, DePoe claims, PC does not account for internalist intuitions.

Huemer rejects I. He aims to convince us that we ought to think that Norman is justified in holding his clairvoyant beliefs. In doing so, Huemer 'defends the clairvoyant's epistemic honour'.

To do this he considers an important part of the case. As DePoe puts it, Norman has no defeaters for his clairvoyant beliefs. This is the gloss that is likely to throw our intuitions off. Here is why. Consider the world as we know it. A claim of clairvoyance flies in the face of common sense: Most people believe that they only have five senses; we know that scientists tend to dismiss clairvoyance; and most of us are aware of many occasions of apparent clairvoyance (or something like it) going awry.[61] So, in the world as we know it we are apt to respond skeptically to purported clairvoyance. However, the world as we know it, is not the same as the hypothetical world of the case. If the world was suitably similar, the case would read as follows:

[61] Think about the times that you or someone you know have said something like "I know I'll win this time, I can just feel it." Think about how often those claims are mistaken.

> [Case 3]: Norman, under certain conditions which usually obtain, is a completely reliable clairvoyant with respect to certain kinds of subject matter. **He possesses significant evidence against the general possibility of such a cognitive power**. One day Norman's clairvoyant powers cause in him an appearance: it seems to Norman that the President is in New York City, though he has no (other) evidence either for or against this belief. In fact the belief is true and the appearance results from his clairvoyant power, under circumstances in which it is completely reliable.

I contend that our inclination to think about Case 3 rather than Case 2 is what drives our intuition that Norman's clairvoyant beliefs are unjustified.

Huemer asks us to think more carefully about Case 2. There, Norman is in the very strange situation of having no reason to doubt clairvoyance and he is also not inclined to think about the reliability of his apparent clairvoyance. Why should we not accept that Norman's clairvoyant beliefs are justified? Given his situation, it would be odd if he did not hold them. In fact, Huemer thinks that Norman's situation with regard to his clairvoyant beliefs is very similar to the position that most people are in with regard to their perceptual beliefs: For many people things seem (perceptually) to be a certain way, they believe that things are that way, they have no defeaters for those beliefs and they are not inclined to investigate the reliability of their faculties. We still say that their perceptual beliefs are justified. Consistency dictates that we should think the same of Norman's beliefs in Case 2. Thus, DePoe's counter-example fails. Claim I is controversial at best.

On this basis, Huemer sets aside clairvoyance cases as a reason to reject reliabilism.[62] The idea is that if Huemer can plausibly reject Claim I (from Case 2) then the reliabilist can plausibly reject Claim i (from Case 1). I don't think he has to go that far. I think that we can embrace PC and still wield clairvoyance cases against reliabilism. To do so we will need to alter Case 1.

The alteration is to dispense with the claim that Norman has no defeaters for his clairvoyant beliefs. In fact, let us add some explicit defeaters. Say that Norman spent much of his time as a researcher investigating clairvoyant claims. He interviewed purported clairvoyants, elicited claims from them that they based on their supposed clairvoyant abilities and then investigated the truth of those claims. In an overwhelming number of cases Norman finds the clairvoyant claims to be false. He has a lot of evidence showing that purported clairvoyance is highly unlikely to be real clairvoyance. Now, later in life, Norman begins to experience certain appearances. He comes to believe that he is clairvoyant and asserts a number of claims on that basis. Since his claims tend to involve the movements of North Korean soldiers through a

[62] (Huemer, 2011, p. 11)

network of secret tunnels, there is no practical way for him to test the reliability of his claims. Nevertheless he continues to hold these beliefs.

Now, let us not forget Bonjour's key ingredient: It turns out that Norman is clairvoyant. Every one of Norman's clairvoyant claims turns out to be true (even though no-one who ever knew of the claims ever found that out). The case, fully specified is as follows:

> [Case 4]: Norman, under certain conditions which usually obtain, is a completely reliable clairvoyant with respect to certain kinds of subject matter. He possesses great evidence against the general possibility of such a cognitive power. One day Norman comes to believe that the North Korean soldiers are gathering in a secret tunnel under Pyongyang. His only evidence (if it can even be said to count as evidence) for this belief is that it non-perceptually seems to him to be the case. Let us also add that it seems to Norman that *his* clairvoyant powers are reliable. His belief is true and results from his clairvoyant power, under circumstances in which it is completely reliable.

Again, let us be specific about the claims that make this a counter-example:

a) Norman's beliefs are (uncontroversially) unjustified; and
b) Reliabilism entails that Norman's belief is justified[63]

Intuitively, it's clear what we should say about Norman. He has gone a little nuts. He has lost his sense of what is rational to believe. He has begun to hold beliefs in the face of very serious counter-evidence. Weighing his evidence against the clairvoyant appearances the only justified thing to believe is that those appearances are non-veridical. His new beliefs are unjustified. Claim b) is true.

Let us turn to Claim a). Consider what the reliabilist must say. For him, the key epistemic feature of Norman's belief is that it is the product of a reliable mechanism. The reliabilist must assert that Norman's clairvoyant beliefs about North Korean soldiers are justified. Given Claim a), this seems wrong. So, it seems that (*pace* Huemer and DePoe) the phenomenal conservative can make use of a slightly adjusted version of Bonjour's example to undermine the reliabilist.

Now the reliabilist does have two lines of reply, all of which involve a more nuanced reliabilist theory. The reliabilist can avoid the clairvoyant problem by making one of the following additions to the theory:

[63] We can very quickly satisfy ourselves that this is not a counter-example to PC. PC must acknowledge that the appearances in this case confer *prima facie* justification. However, the weight of evidence defeats that. According to PC, Norman's beliefs are *ultima facie* unjustified.

i) Causation by a reliable mechanism is a necessary condition of justification, not a sufficient one.
ii) We could add Goldman's qualification.[64] There must be no reliable process available to the subject that, were it used by the subject in addition to the process actually used, would result in her not believing P.[65]

The second line is more interesting. It allows that reliablism might capture the internalist time-slice intuition and undermine internalist theories. I shall explore it very briefly.

The starting point for a reply along the lines of ii) is to indicate what other belief forming processes might conceivably be operating in Case 4. The obvious candidate is inference. A reliabilist could very plausibly say that Norman's inferential beliefs are the product of a reliable process. So, Norman's inferential beliefs are relevant to the reliabilist verdict on Norman's justificatory state in Case 4. Thus, the question arises: In Case 4, what would those beliefs be?

Most likely these would be the beliefs that Norman formed on the basis of his studies of clairvoyance. On the basis of reliable inference he surely holds that clairvoyant beliefs are unreliable. This is precisely what acted as a defeater in the M-PC reading of the case.

So, the reliabilist verdict on Case 4 is not as straightforward as some might think. The matter is complicated by the fact that beliefs that are the product of two different reliable mechanisms are in conflict. Norman's clairvoyant beliefs conflict with his inferential beliefs. Now the reliabilist might give us an account of how to weigh up the products of different reliable belief producing mechanisms. Alternatively, he might simply claim that Norman's clairvoyant beliefs are unjustified in virtue of the conflict. This puts the reliabilist's verdict back in line with common sense.

I shall not go into whether or not I think that this line is successful. Rather I shall point out an interesting consequence of following it.

If the reliabilist points to inference as a reliable belief forming process, it is an open question as to what other processes ought to be embraced as reliable. One possible candidate is the process of moving from an appearance that p to a belief that p. My guess is that most reliabilists would resist this. However, if I can show that an adequate theory of mnemonic justification requires

[64] (Goldman, 2011)
[65] Huemer (albeit in a different context) suggests that the most plausible version of reliabilism is one that is similarly altered: S is justified in believing that p, if S formed the belief that p by a reliable method, S has no beliefs that either support -p or support the proposition that S formed the belief that p by an unreliable method, and S has no available reliable belief-forming method that, if used, would have led S to believe that -p. (Huemer, 2006)

PC, then the reliabilist's hand is forced. He must incorporate into his theory the claim that such a process is reliable.

So, I concede that clairvoyant cases do not necessarily undermine reliabilism. However, a plausible response to the clairvoyance problems opens up a scenario in which PC and reliabilism are compatible.[66] With that gap open, I continue to defend PC as a necessary component in a satisfactory theory of mnemonic justification.

4.3.2 Foley's objection to epistemic conservatism

Richard Foley presents an apparent counter-example to epistemic conservatism.[67] Huemer considers this example, and while he accepts that it undermines one variety of conservatism, he argues that PC is not threatened by the example.[68] Nathan Hanna disagrees, he argues that Huemer's considerations are not sufficient to rebuff Foley's counter-example. In this section, I shall analyse the dispute and provide a stronger defence for PC.

We must begin with some terminological ground-clearing. 'Epistemic conservatism' (EC) is a broad term that covers a range of positions. PC is a token of that type. Another conservative position is what Huemer calls 'doxastic conservatism' (DC). Here, let us say that EC covers both PC and DC. DC is characterised by the following claim:

> DC: If S believes p, then, in the absence of defeaters, S thereby has at least some degree of justification for believing that p.[69]

This claim is explicitly embraced by McGrath.[70] It is explicitly rejected by Huemer.[71] The importance of distinction between the varieties of epistemic conservatism will become apparent. For now, let us turn to Foley's counter-example. Hanna recounts the example as follows:

> [F1] Suppose S is just short of enough evidence for justifiably believing that p and irrationally decides to believe it anyhow. If EC is true, S will thereby secure some

[66] I explore this further in Section 5
[67] (Foley, 1983)
[68] (Huemer, 2001, p. 112)
[69] McGrath (p28) embraces this claim: "if one believes that *p*, then one is *prima facie* rational in retaining that belief"
[70] (McGrath, 2007, p. 14)
[71] (Huemer, 2001, p. 112)

> justification for believing that p. Given that S was just short of enough justification before, S will now be justified in believing that p, in part because S believes it.[72]

Foley's claim is that epistemic conservatives must acknowledge that S's believing p confers some justification on S's belief that p. This extra justification is enough to make S's belief justified. So, in this case, the mere fact of S's coming to believe p unjustifiedly results in S believing p justifiedly. This is an unwelcome consequence for any theory and so conservatism is false.

Huemer's response turns on the claim that appearances are distinct from beliefs. If they are distinct, it is clear that PC does not come to the verdict that S's belief is justified. Only if S had an appearance that p, would PC rule that S justifiedly believes p. However, as Foley puts it, the example makes no mention of any such appearance. S's belief, by itself, confers no justification. So, the objection gains no traction against PC.

Obviously, the success of this reply depends on Huemer successfully showing that appearances are distinct from beliefs. In order to draw this distinction Huemer presents some paradigmatic examples. Consider perceptual appearances, often it will seem to me that p while at the same time I don't believe p. For example, observing a pencil in a glass of water, it will seem to me that the pencil is bent, however I will not believe that the pencil is bent. In my discussion regarding the nature of appearances I gave several non-perceptual examples. Huemer takes these examples to show that beliefs are not appearances.

Hanna takes issue with this argument. He is right to do so. Huemer has established a claim about the distinction between beliefs and appearances, however it is not the strong claim that he wants. On reflection, we can see that Huemer's examples show that *some appearances are not beliefs*. This does not fully distinguish the two, for that claim is consistent with the claim *all beliefs are appearances* or *some beliefs are appearances*. Hanna argues that the latter is sufficient to undermine PC.

Without a stronger argument from Huemer, it looks like Hanna can simply run Foley's argument specifying that the case at hand involves a belief that is an appearance. That way, the belief confers justification on itself and we get the unacceptable conclusion that S's belief that p is made justified by S's coming to believe p unjustifiedly. So, a Foley-style counter-example seems to show that PC is overly liberal.

[72] (Hanna, 2011, p. 4)

Reply: No belief is an appearance

The obvious line to run in defence of PC is to argue that no beliefs are appearances. I shall do this by first looking at Hanna's support for the claim that they are, showing why that support is not sufficient and offer some suggestions for why the two are distinct.

Hanna argues that beliefs and appearances are suitably similar. He points out that they are both propositional attitudes of the same ilk. Both have some propositional content and in both, that content is presented as being true. Beyond this, Hanna claims, there is no epistemically relevant criterion for distinguishing the two. He argues that features lend support to the claim that beliefs can behave like appearances.[73] On this basis, Hanna claims that "beliefs can behave like appearances". One way to read this claim is that Hanna thinks some beliefs are appearances.

In response to that reading, Kevin McCain (2011) offers a simple argument to the effect that no beliefs are appearances. It runs:

1) No appearance can have epistemic reasons in support of/against it.
2) Every belief can have epistemic reasons in support of/against it.
3) Therefore, no belief is an appearance.

The idea is that, pace Hanna, there *is* a significant difference in the epistemic character of appearances and beliefs. That difference lies in the causation and appraisal of the two. We can say that beliefs are properly caused by appropriate evidence. When they are properly caused, they are properly held. However, for appearances it makes no sense to say anything like that. It is meaningless to say that a subject has evidence for some appearance.

Another way to put the point is that there is a necessary condition for belief-hood that appearances just cannot meet. Appearances cannot be the proper object of epistemic criticism. Again, we need not think that the argument is decisive in order to dismiss Hanna's position. What the argument does show is that Hanna owes us a far more detailed account than he gives. In the absence of further reasons, we are warranted in holding that beliefs are not appearances.

Objection: Beliefs can behave like appearances, even if they are not appearances

This is not the end of the line for Foley-style objection. As McCain points out, there are several possible readings of Hanna's claim that beliefs can behave like appearances. We have dispensed with only one. Now, I shall turn to another. I think that the most plausible reading of Hanna's

[73] Kevin McCain (2011) argues that this claim can be read several ways. I shall return to this.

claim is to interpret him as saying that *beliefs cause appearances*. This avoids the previous response and still sets up a problem for PC.

Think about an altered version of Foley's case.

> [F2]: S has almost, but not quite enough evidence for p. However, S believes p anyway. That is, S comes to believe p unjustifiedly. Because S believes p, S has an appearance of p. That appearance confers some justification sufficient to shift the evidential balance. So, S is then justified in believing p.

There are more links in the chain this time, but it still looks like S's coming to believe p unjustifiedly renders S's belief that p justified. Even in the face of the weaker claim that *some beliefs cause appearances* PC faces a problem.

Reply: PRES rescues M-PC

A response to this requires more work than a response to the previous objection.

To begin with, we must recognise that cases where beliefs cause appearances are peculiar. Of course, we shall follow Hanna. Importantly, he does not argue that *all* beliefs behave like appearances. He gives us only one kind of case in which we are to think that this is so. That case is where dispositional (non-occurrent) beliefs become occurrent. He provides one example: I believe that a politician is corrupt. This belief is not occurrent. When I see the politician on television, this belief suddenly and unexpectedly becomes occurrent. In that moment, my belief behaves like an appearance. Because of the belief, not anything that I see on the television, it seems to me that the politician is corrupt.

Since these are the cases that most plausibly generate appearances, these are the cases that must be used against PC. So we limit our discussion to one kind of case: One in which a subject's dispositional beliefs are made occurrent.

Considering those cases carefully, we will notice something important. The belief at hand must be considered over time. It is dispositional at one time, and occurrent at a later time.

The fact that these cases are concerned with a belief at two different times, T1 and T2, is vital to my response. The way that the cases are formulated inclines us to miss that important detail. I shall reformulate F2 making explicit how the appearance is generated.

> [F3]: S has almost, but not quite enough evidence for p. However, S believes p anyway. That is, S comes to believe p unjustifiedly **at T1**. S's belief that p then ceases to be occurrent. At a later time, **T2**, S's belief that p becomes occurrent again. This

causes S to have an appearance that p. That appearance confers some justification sufficient to shift the evidential balance. So, S is then justified in believing p. Of course, we think that S is not justified in believing p, so this constitutes a counter-example to PC.

The response should now be clear. Properly specified, this case looks like a justification-switch case. The confusion in those cases resulted from the application of different perspectives on justification. Some consider an agent's justification historically and some consider it at a particular time. These perspectives are apt to drive different intuitions.

In order to capture both sets of intuitions, my proposed apparatus for dealing with the justification of beliefs over time is M-PC. That theory incorporates a preservationist component, PRES. Applying the theory we can properly describe F3. At T2, S's belief accords with the balance of evidence, since M-PC entails that the appearance at T2 is justification-conferring. So, M-PC rules that S is justified in believing p at T2 - we might say that S would be justified in retaining p at T2. However, that neglects the historical perspective. At T1, S's belief is formed unjustifiedly. As a result, M-PC rules that, all things considered, S is unjustified in believing p.

Succinctly: From the historical perspective, the belief in F3 is unjustified. From a time-slice perspective, the belief in F3 seems justified at T2. M-PC is consistent with both of these claims. So, when we take beliefs to *cause* appearances, Foley-style counter examples gain no traction against M-PC.

4.4 An abductive argument

Having shown that M-PC can account for our intuitions in the most prominent and difficult cases regarding mnemonic justification, we can provide a simple abductive argument for M-PC. I take this argument to be implicit in much of what I have said above, but it might be useful to make my argument explicit. It runs like this:

1) We need to explain why certain claims about mnemonic justification are true. These concern cases where we have a strong intuition that our memory beliefs are justified.
2) We have seen that reliabilism, evidentialism, coherentism, traditional foundationalism and preservationism simpliciter all fail to explain our intuitions regarding certain problematic cases.
3) M-PC accounts for our intuitions in all of those problem cases.
4) M-PC is the best explanation of mnemonic justification.
5) M-PC is (probably) true.

Section 5

In this section I deal with several loose ends. My aim here is to clarify the broad dialectical lines of the previous sections. I shall also anticipate and answer certain substantive questions that the reader might have. Finally I shall point to some weaknesses of M-PC and mention areas that require further work.

5.1 The structure of my argument

Having spent a significant amount of time on individual portions of my argument, it will be helpful to recapitulate its over-arching structure. Primarily, I have aimed to argue for the claim that **the most plausible account of mnemonic justification is M-PC**.

M-PC is a two part theory encompassing the claims PC and PRES. As such, I have to motivate M-PC in three ways:

i) Firstly, I argue for the dualistic nature of any satisfactory account. I do this in Section 2 by showing that our intuitions regarding the justification of memory beliefs are likely to be influenced by the perspective that we take. These are the 'historical' and the 'time-slice' perspectives. Since we consider memory beliefs from two distinct perspectives, a satisfactory theory of memory beliefs must account for the intuitions generated by looking at problem cases from each of these perspectives.

ii) Secondly, I argue that PRES is a necessary part of a satisfactory account. I do this in Section 2 by a reductio on the denial of PRES. There, I also show that a similar preservationist condition is unable to account for our time-slice intuitions: our puzzle is missing a piece. Throughout the paper, the way that PRES operates in dealing with problematic examples should convince us the PRES does most of the heavy lifting in accounting for our historical intuitions.

iii) Finally, I argue that PC is the missing piece of the puzzle. My argument to this effect is abductive. While evidentialism (two-types), coherentism and reliabilism fail to account for our time-slice intuitions, PC does so with very little fuss. Thus, PC provides the most plausible condition to add to PRES. Section 3 and 4 show that together these conditions handle mnemonic problem cases of every variety.

5.2 Is M-PC an internalist theory?

To internalists, the fact that M-PC embraces PRES might be worrying. At first blush, PRES appears to be inconsistent with internalism and so M-PC seems like an admission of defeat. In fact, Goldman (2009) argues that the necessity of a preservationist condition to an adequate account of mnemonic justification shows that internalism is false.

That follows from Goldman's picture of internalism. He asserts that internalism is (minimally) characterised by the claim that justifiedness at a given time does not supervene on states obtaining at that time.[74]

Clearly, Goldman's terminology does not match up with mine.[75] However the matter is more than terminological. Goldman takes the internalist position to entail something like the following claim: At some time, T, a subject's justificatory states supervene on only his mental states. This is undeniably a central tenet of traditional internalism. Minimally, a preservationist condition introduces supervenience on prior states of the subject. So preservation involves the denial of traditional internalism.

I think that little can be said in response to this line. M-PC entails the denial of traditional internalism. However, I do not think that this undermines the internalist project to the extent that one might suppose.

Internalists need only shift to a new central tenet. Huemer suggests that justification may still supervene on the total history of intrinsic states of the believer.[76] This retains the internalist intuition and is merely a sensible revision in light of what we have learned about the epistemology of memory. Moreover, internalist accounts of perception will still entail that justification supervenes on the intrinsic states of the believer at a time.

Although, I lean towards internalism, I aim to seal off those leanings from this paper as far as I possibly can. I think that we ought to adopt M-PC. In my view, internalism and externalism ought not be the central issue in this discussion. What really matters is that we edge closer to a true theory of the justification of memory belief. If that theory turns out to be externalist, so be it.

[74] (Goldman, 2009, p. 17)
[75] For, I have used 'at a time' to indicate the time-slice perspective.
[76] (Huemer, 1999, p. 352)

5.3 Is M-PC an externalist theory?

Externalists might worry (or even object) that M-PC is inconsistent with externalism. As I have just indicated, I don't think that this is a well-founded worry. However, addressing it is instructive.

It is worth thinking about what it would take to be a reliabilist (i.e. a typical externalist) and simultaneously hold M-PC.

First, we must recognise that the challenge for the reliabilist would be to consistently accept PC. PC is the centrepiece of Huemer's phenomenal conservatism. However, that theory also involves several other claims, one of which is that appearances form the basis for the justification of all non-inferentially justified beliefs. This entails the denial of reliabilism.

An example serves to illustrate the point: Perceptual beliefs are the archetype of non-inferentially justified beliefs. If we adopt phenomenal conservatism, we are committed to the claim that only appearances confer justification upon our perceptual beliefs. The reliabilist would claim that all of the epistemic work is done by the fact that our perceptual apparatus is part of a reliable belief-forming process. Since each of the theories indicates that a different source is the only justifier of perceptual beliefs, they are straightforwardly incompatible.

M-PC does not go as far as to embrace the claim that appearances form the basis for the justification of all non-inferentially justified beliefs. This leaves room for an externalist to embrace PC (or something similar).

In response to the pull of intuitive PC, Michael Bergmann offers "an externalist-friendly account of the seemingly pervasive role of appearances in the formation and justification of our non-inferential beliefs".[77]

Essentially, his point is that a reliabilist could plausibly argue that the process by which we form beliefs on the basis of appearances is **sometimes** reliable. This is to alter PC slightly. A proponent of Bergmann's response would likely endorse this principle[78]:

> PCE: If it seems to S that p, and that seeming is properly caused then p has some prima facie justification for p.

[77] (Bergmann, 2008, p. 3)
[78] Bergmann points out the response but does not endorse it.

A good reason to pursue this line would be an independent commitment to reliabilism. That is beyond the scope of this paper. As such, I mention this line only to make a simple point. M-PC is compatible with externalism. However, PC does seem to place a strong restriction upon it.

5.4 The inclusivity of M-PC

From 5.2 and 5.3 it should be clear that M-PC is compatible with some version of reliabilism and some version of foundationalism. We have seen that PC could be true on either a foundationalist or a reliabilist picture: PRES is consistent with an important internalist intuition even though it is at odds with traditional internalism; and PRES is naturally accommodated by the reliabilist.

The inclusivity of M-PC is a function of the fact that it is constituted by only two claims. I have tried to make it clear throughout that I aim to endorse only PC and PRES as they stand. This is contrary to the common practice. Huemer accepts several internalist claims in conjunction with PC and those who accept PRES generally accept externalism. In this paper, I do not wish to endorse any of their common accompaniments. I have merely proposed and defended two claims that any theory of justification must accept in order to account for the mnemonic justification. In this sense, M-PC places two constraints on any true theory of justification.

The inclusivity of the theory is particularly apparent when we consider its constituent parts. PRES is silent on what it is to be justifiedly formed and PC is silent on what counts as a defeater. Indeed I have left open the analysis of both of those concepts in the foregoing discussion.

The upshot of this openness is that M-PC is compatible with any number of widely held epistemic views. Foundationalists, reliabilists and even coherentists can align their positions with M-PC.[79] While I have set important constraints, I have not engaged in an attempt to settle once and for all the disputes regarding which (if any) widely-held theory is the true theory of justification. Settling those matters partly involves filling out the broadly specified portions of PRES and PC. I could not do that here.

Of course, a full account of justified belief formation and an account of defeaters are vital epistemic projects. However, I don't think that those matters can be settled by considering the faculty of memory alone. Epistemological consideration of perception, testimony, inference and introspection will place constraints of their own on a general theory of justification. That the conditions imposed by M-PC are widely compatible is indicative of their importance. My

[79] Admittedly, this might take some work for coherentists. They would most likely have to take up a position similar to Haack's foundherentism. (Haack, 1995) That hard work is not all bad news, perhaps M-PC provides a framework in which we could preserve the coherentist insight while jettisoning the coherentist implausibility.

inclusive theory of mnemonic justification can guide these considerations while accommodating their insights.

5.5 Non-occurrent memory beliefs

One difficult area for theories of mnemonic justification concerns non-occurrent memory beliefs. Those are beliefs that are formed and then stored by an agent. Although they are stored by the agent, he is not conscious of them. Most of our beliefs are of this type.

The problem that they pose is particularly acute for foundationalist theories. Those theories (for the most part) endorse the claim that a memory seeming confers justification on a memory belief when that belief is recalled. Non-occurrent memories are not accompanied by memory seemings. Thus, there is nothing in virtue of which they can be justified. This is unacceptable. We commonly take our non-occurrent beliefs to be justified.

M-PC is capable of handling these beliefs in virtue of its commitment to PRES. M-PC's claim is therefore that non-occurrent memory beliefs are justified (or unjustified) in virtue of the fact that they were justifiedly (unjustifiedly) formed.

So, while M-PC can account for a foundationalist intuition, it is also clearly capable of handling non-occurrent memory beliefs.

5.6 Neglected areas

Finally, I wish to point out areas in which M-PC might be strengthened. Two of M-PC's weakest points are these: Firstly, M-PC rests on a specific account of appearances. That account is controversial. Secondly, I have provided no direct argument for the PC. While my abductive argument does some work, PC might be more strongly grounded. I shall consider each of these points in turn.

My arguments regarding PC turn on a specific account of appearances. In part, I lean on this account to defend PC from Hanna. More seriously, without this account it is difficult to make sense of PC as a claim. The account that I give is contested. In fact, the metaphysics of appearances has not seen much attention at all.[80] This being the case, more research into appearances could put M-PC on firmer footing. Of course, this research could equally undermine M-PC. Either way, such an investigation would be useful.

[80] See (Cullinson, 2010)

Another good way to strengthen M-PC is to offer further arguments for its component parts. I take Goldman's reductio to be strong support for PRES. However, a similarly strong argument for PC is missing. I take my abductive argument for PC to warrant our holding it but the case ought to be strengthened.[81]

I shall not give such an argument here, but I shall note some important points about how this might be accomplished.

The most natural place to seek support for PC is in arguments for phenomenal conservatism. Huemer has at least two arguments for phenomenal conservatism: The Self-Defeat argument and an extended version of the Clairvoyant Brain argument. I take both of these arguments to fail in establishing phenomenal conservatism. I have shown that the Clairvoyant Brain does not give us sufficient reason to reject reliabilism.[82] Additionally, there are several plausible reasons to reject the Self-Defeat argument.

In spite of those difficulties, I contend that we should not cast aside those lines. Instead, we should notice that phenomenal conservatism involves more than just PC. So, a failure to establish conservatism should not lead us straightaway to abandon those arguments. It is plausible that we might wield in a new way. Particularly, I think that a variations on the Clairvoyant Brain argument could establish PC. That is a project for further research.

5.7 Conclusion

In the pages above, I have argued that we should accept M-PC. Primarily, we should do so because it does exceptionally well at explaining our intuitive judgements regarding the justification of memory beliefs. It certainly does this better than other theories of mnemonic justification.

Accepting M-PC does not rule out holding any of the most widely-held general theories of justification. However, doing so would place very definite constraints on those theories. Such constraints ought to be welcomed for they ensure that any general theory that accepts them can deal satisfactorily with the problems of mnemonic justification.

[81] Tucker (2010) also gives an abductive argument for something like PC.
[82] Reliabilism is inconsistent with phenomenal conservatism. It is consistent with PC.

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