

Epistemic Responsibility, Gettier Analysis and its Influence in Feminist Philosophy¹

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The Idea of Epistemic Responsibility (ER) emerged in epistemology was initially a response to Gettier. Classical thinkers, in response to Gettier, offered different directions for epistemic justification and strengthened the notion of ER. This study examines the evolution of ER from its classical origins in responses to Gettier's critique of the justified true belief (JTB) model to its feminist reformulation in Lorraine Code's *Epistemic Responsibility*. It hypothesises that Code's concept of ER offers a philosophically robust and ethically grounded resolution to the Gettier problem by shifting epistemic justification from the abstract cognition to the situated, morally engaged practice. Using an analytic and comparative method, the research juxtaposes classical epistemologists such as Sosa, Chisholm, Bonjour and Kornblith with feminist theorists, especially Code, to trace how moral accountability, situated knowledge and relational trust redefine justification. The findings reveal that feminist conceptions of ER transform epistemology from a formal, context-free model into an ethically responsive framework that views knowledge as a moral and relational achievement. ER reframes the Gettier-style epistemic failure as a lapse of moral and cognitive responsibility rather than a mere problem of epistemic luck. Integrating intellectual virtue with moral accountability, ER thus bridges classical and feminist epistemology, offering a holistic, context-sensitive model of knowing.

Keywords: epistemic responsibility, feminist epistemology, justification, Lorraine Code, Gettier

INTRODUCTION

The idea of epistemic responsibility (ER) is a contributive factor for the advancement of knowledge as it addresses the questions of why should we give priority to knowledge than belief and what are the differences between the person who knows something and who purely believes something. It is required in search of truth, in revising beliefs and in giving proper reasons. Scholars define ER diversely. Lamy states that the adjective 'epistemic' signifies the kind of responsibility under consideration deals with practices that aim at producing true beliefs and 'responsibility' stands for virtues that help to fix epistemic issues and define ER

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as ‘the disposition to account for one’s own epistemic faults (Lamy 2022: 2). Having adequate knowledge of the world and the obligation to “know well” is considered ER by Lorraine Code in her master piece on ER’ (Code 1987: 54).

The early discussions on ER by Ernst Sosa, Laurence Bonjour, Roderick Chisholm and Hilary Kornblith emerge as responses to Edmund Gettier’s 1963 critique of the justified true belief (JTB) model of knowledge. Gettier demonstrated that one could have a belief that is justified and true, yet still fail to know – a challenge that prompted these philosophers to refine the concept of justification. Sosa, in response, emphasises the importance of ‘being in a position to know’, meaning the agent must avoid cognitive defects and base beliefs on accurate data (Sosa 1974: 118). For him, epistemic concepts are normative, and ER involves cognitive competence and data accuracy. Chisholm highlights the need for ‘adequate evidence’, asserting that a proposition is evident when it is more reasonable to believe it than to withhold belief (Chisholm 1977: 1). Thus, knowledge involves a relation between truth, evidence and the epistemic agent. Bonjour advances the idea that epistemic justification must be ‘truth-conducive’ – a good reasoning that reliably leads to true beliefs (Bonjour 1978: 5). He argues that justification must be grounded in strong reasons, thereby resisting Gettier cases. Kornblith extends this by insisting that responsible belief formation involves not only proper reasoning but also proper evidence-gathering. He promotes a synthesis of the theories of ideal reasoning and ideal evidence collection, emphasising the importance of reliable processes (Kornblith 1983: 35). These thinkers shift the epistemic focus from a passive belief acquisition to an active, ethically-influenced engagement. Sosa later introduces the criteria of accuracy, adroitness and aptness to assess epistemic performance, reinforcing the value of knowledge over mere true belief (Sosa 2007: 24). Chisholm parallels ethics and epistemology, both as normative disciplines concerned with justification. Kornblith, in turn, connects knowledge with empirical investigation. These insights lay the groundwork for contemporary developments in ER, notably in Lorraine Code’s work. Medina and Whitt (2021) explore how epistemically oppressed subjects resist agential epistemic injustices through *epistemic activism* – collective actions that reclaim epistemic agency and challenge structures of silencing. Extending this, Medina (2022) diagnoses failures of ER in distorted epistemic environments that undermine group agency and proposes strategies for fostering just and responsible epistemic collectives. These works articulate a relational, action-oriented model of ER rooted in resistance, solidarity and collective agency. Grasswick (2019) complements this by outlining three layers of ER essential for ‘healthy’ epistemic trust: individual responsiveness to evidence, communal engagement in sustaining trust and structural critique of epistemic norms to promote justice and inclusivity. Following Codean insights, Anthony (2024) links ER to self, society, space, sex, sphere and social justice, aligning it with the moral domain of social responsibility. Extending this, Anthony (2025) frames ecological citizenship as participatory engagement with material reality grounded in ethical and ER. These perspectives shift ER from individual cognition to relational, communal and ecological practices integrating accountability, trust and justice.

This paper primarily analyses Lorraine Code’s contribution towards the idea of ER. The analysis starts with the exposition of historical background of ER as an aftermath of Gettier discussions and proceeds to Lorraine Code’s evaluation of it. The objective of this paper is to analyse Lorraine Code’s contribution to ER by exploring how her integration of virtues, situatedness, belief and ignorance reshape the discourse of knowledge production. It argues that Code’s perspective on ER contributes to feminist epistemology and enlarges the discussions

of Gettier. Focusing on Lorraine Code's *Epistemic Responsibility*² (1987), this study examines the development of ER through three sections: (1) Lorraine Code and ER, outlining the origins and key arguments of her framework; (2) Codean Perspectives in feminist epistemology, analysing its ethical, relational and contextual dimensions; and (3) Rethinking the Gettier Problem through feminist lenses, applying Code's insights to feminist critiques of traditional epistemology. This study, situated in feminist epistemology and informed by virtue and social epistemology, uses conceptual analysis and critical interpretation of Lorraine Code's works to examine how ER redefines knowledge and justification. Through comparative and contextual analysis, it reinterprets the Gettier problem from a feminist standpoint that foregrounds the ethical, relational and situated nature of knowing. Through close reading and hermeneutic interpretation, the analysis identifies key elements of the concept, interprets their interrelations with feminist epistemology and Gettier analysis, and situates them within broader feminist epistemological debates.

LORRAINE CODE ON ER

Plato's conception of knowledge as *JTB* remains foundational to epistemology, yet feminist critiques expose its implicit exclusions. His ideal of pure, rational truth establishes a gendered hierarchy that privileges disembodied reason over embodied experience. Feminist writers who generally critique the traditional epistemology and demands that knowledge must include the subjectivity and situatedness of the knower, embracing a positive stance on ER, have contributed to the development of the notion of ER. Among the feminist writings on ER the *magnum opus* is *Epistemic Responsibility* of Lorraine Code. She traces the origin of the term ER in the writings of Sosa and Bonjour. According to her, ER is 'a responsibility to know well and to be answerable for one's beliefs and the processes by which one arrives at them' (Code 1987: 29). She emphasises that acquiring sufficient knowledge about the world constitutes a moral obligation. It 'is not just an intellectual achievement, but a moral one; responsibility in knowing involves being aware of one's situatedness, the social implications of belief, and the effects of ignorance' (Code 1987: 30). We may identify four interrelated components in this process. First, knowing well transcends intellectual achievement and carries moral significance. Second, ER requires an awareness of one's situatedness – that is, an understanding of how one's social, cultural and historical position shapes access to and interpretation of knowledge. Third, responsible knowing entails a critical engagement with the social and political implications of belief, recognising that knowledge practices are not neutral but embedded in structures of power. Finally, it demands an active resistance to epistemic complacency, calling on knowers to seek out marginalised perspectives and confront forms of wilful ignorance.

At first, the moral significance of ER posits that the characteristics of the knower, as well as the environment and epistemic community in which they operate, significantly impact the growth of knowledge for both individuals and society. Code stress the importance of the integrity of sources, explaining that trust in a statement depends on the character, moral integrity and reliability of its origin, as well as the epistemic dependability of scientific contributions (Code 1987: 27). Evaluating intellectual activities, or 'knowing', through this lens involves

² In her later works, Code addresses the historical neglect of ER. In '*Epistemic Responsibility*' (2017), she contends that responsibility entails engaging with subjectivity in knowledge-making and critically evaluating epistemic practices. In '*Epistemic Responsibility Now*' (2020), she extends this framework to a polarised context shaped by systemic injustice, climate denial and public distrust, emphasising humility, vigilance against error and sensitivity to the social consequences of knowledge.

analysing intellectual virtues while taking into account socially recognised standards of virtuous behaviour. ER values knowing and understanding how things really are. There are right and wrong ways to acquire knowledge and interact with others through responsible ways. Knowing well is attained by cultivating virtues that allow them to interact with others in a morally responsible manner and providing an account of moral activity and reasoning that is social.

Secondly, Code's conception of ER is novel in its emphasis on situated knowledge as for her 'knowing is situated' (Code 1987: xix). Intertwined with prevailing social beliefs and linguistic frameworks, our lived experiences profoundly shape our perceptions, interpretations and interactions with the world. Contextual factors such as material conditions, political environments, cultural contexts and myriad other elements, play significant roles, either facilitating or hindering knowledge production and raising questions of responsibility. Situatedness implies that our relations with others position us in relation to the world, fundamentally shaping our epistemic landscapes. Contextual analysis serves as a formidable challenge to the conventional notion of impartial and value-neutral knowledge and also to the inherent androcentric biases (Code 1995: 173).

Thirdly, Code contends that ER encapsulates a dynamic interplay between belief and evidence. Thus, epistemic justification transcends a mere cognitive alignment with truth. It rather necessitates a responsible and proactive engagement in knowledge acquisition. The concept of justification in Code is unfolded through a dual lens: (i) evaluating the likelihood of beliefs aligning with truth and (ii) focusing on their potential to become knowledge. This dual perspective highlights an intricate tapestry of epistemological inquiry, where genuine belief requires both conviction and substantiation through evidence in consonance with reality. ER, therefore, serves as a gauge of one's commitment to consistently grounding beliefs in the actual world. Code (1984: 31) characterises human cognition as a dynamic, creative process, wherein individuals actively synthesise experiences to formulate beliefs. Belief formation, as a deliberate and accountable endeavour, has a scope of refining and revising beliefs in the light of new evidence. So, Code highlights knowledge as a collective enterprise within an epistemic community. Knowledge burgeons, persists and evolves through interactions with both the world and fellow knowers (Code 1987: 172; Code 1983: 541).

Lastly, Code considers the notion of ignorance in her doctrines on ER. According to her, 'epistemologies of ignorance study the conditions that promote and sustain ignorance' (2014: 154). Ignorance is not merely the absence of knowledge but 'a force all its own, often blocking knowledge' (Code 2014: 154). Feminist scholars have critically engaged with the concept of ignorance, recognising its intrinsic connection to systems of oppression and exclusion. Unlike traditional epistemological frameworks, which often view ignorance as a mere absence of knowledge and dismiss its systematic study as peripheral, feminist epistemology positions ignorance as a central subject of inquiry. The 'epistemology of ignorance' examines how unjust and oppressive social structures actively produce and sustain ignorance. This perspective frames ignorance not as a passive condition but as a deliberate and harmful phenomenon that reinforces the marginalisation of oppressed groups within inequitable societies. Feminist analyses emphasise the complexities of knowledge production, focusing on the socio-political and cultural forces that determine what is known and what remains obscured. By interrogating these dynamics, feminist epistemologies highlight the critical role of ignorance in perpetuating power and privilege. They provide a robust framework for understanding how knowledge systems reinforce exclusion and oppression while also offering tools for epistemological and social critique to address these inequities and promote justice.

Classical philosophy established the foundations of epistemology but often defined knowledge as abstract, universal and detached from lived experience. In *Republic* (Plato, c. 380 BCE/1992), reason is exalted as the path to truth, and although women's philosophical potential is acknowledged, the ideal knower remains disembodied. *Nicomachean Ethics* (Aristotle, trans. 2009) links moral and intellectual virtue, anticipating later developments in virtue epistemology. In contrast, *Meditations on First Philosophy* (Descartes, 1641/1984) reinforces a solitary conception of the rational subject. Feminist epistemologists, especially Lorraine Code, challenge these traditions by emphasising situatedness, relationality and epistemic responsibility. Code reconfigures classical intellectual virtue into a moral and contextual practice of 'knowing well', grounding epistemology in ethical and social realities. Code's framework of ER foregrounds the moral dimensions of knowing, the significance of situatedness, the critical interrogation of belief and the epistemic function of ignorance. These interconnected themes are central to her reconfiguration of knowledge as both ethically and contextually grounded. Notably, these concerns are not isolated but resonate deeply within broader feminist epistemological discourse, where they are afforded analytical priority. The following section examines how these themes are critically engaged within feminist epistemological reflections.

CODEAN PERSPECTIVES IN FEMINIST EPISTEMOLOGY

Feminist approaches to virtue ethics challenge the assumptions and values embedded in traditional ethical systems, making virtue ethics more sensitive to the lived realities of human beings. They focus on the identification of hermeneutic and testimonial injustices which are rooted in power imbalances and prejudices that distort individuals' ability to communicate and be recognised as knowers. Addressing these injustices is a vital aspect of ER (Fricker 2007: 1–2). Feminist scholars advocate for epistemic resistance as a means to combat oppressive structures and challenge complacency in order to ensure that alternative voices and ways of knowing are not suppressed (Medina 2013: 3–4). Epistemic resistance is a critique of dominant knowledge structures and a manifestation of ER, ensuring space for diverse perspectives. Resistance here requires a deep awareness of one's own epistemic practices as well as those of others, fostering epistemic virtues such as open-mindedness, humility and diligence. These virtues enable individuals to engage meaningfully with information about themselves, others, and the world they inhabit.³

Secondly, feminist epistemic reflections advocate for knowledge production occurs from a particular position, and thus, individuals must recognise their responsibility for their enabling practices (Haraway 1991: 191). This recognition of situatedness challenges the notion of detached, neutral knowledge and affirms that all knowledge is contextually embedded. Sandra Harding argues that subjugated groups possess the epistemic advantage to produce more objective knowledge due to their marginalised positions.⁴ She contends that social location

³ According to Daly (2019), Merleau-Ponty's phenomenology establishes a philosophical basis for an ethics aligned with feminist commitments to embodiment, situated knowledge, plurality and relational subjectivity. His account of embodied perception dismantles the disembodied 'view from nowhere' that masquerades as objective universality. Through the notion of the perceptual gestalt, he reorients perception toward the embodied subject, whose intersubjective nature grounds both vulnerability to others and the ethical capacity for care.

⁴ For Kumar and Lalmohan (2024), Feminist standpoint theory rests on two key concepts: situated knowledge and epistemic advantage. Situated knowledge holds that social location shapes human experience, while epistemic advantage maintains that certain standpoints possess the privileged epistemic access.

significantly shapes what and how we know, others highlight the epistemic advantage offered by the standpoints of marginalised groups (Harding 1991: 139).

Thirdly, in feminist epistemology, the concept of epistemic justification is closely linked to the need for a reliable warrant for the true belief.⁵ Feminist scholars contribute to this discourse by advocating for clear standards of evidence and robust bodies of evidence as essential components of ER. They highlight the importance of these standards in order to truthfully represent the facts of the world (Grasswick 2011: 5). They recommend the establishment of objective communities that function on principles of equality, critical engagement and shared intellectual abilities. Such communities are essential for ensuring the objectivity of scientific practices and knowledge production (Longino 2002: 129–131).

Lastly, the feminist critique of traditional epistemologies highlights their narrowness in addressing the complexities of truth, particularly with regard to the role of ignorance. They emphasise that conventional epistemologies fail to account for how ignorance is socially and epistemically constructed, and how it can hinder the pursuit of truth (Tuana 2017: 94). They also introduce the concept of pernicious ignorance, a form of ignorance that actively obstructs understanding and perpetuates harm, especially towards marginalised individuals. Pernicious ignorance, Dotson argues, is not simply the absence of knowledge but a deliberate epistemic practice that sustains oppressive power dynamics (Dotson 2012: 239). Ignorance cannot merely be understood as the absence of knowledge. Rather, ignorance is an epistemic practice, shaped by a ‘historically specific mode of knowing and perceiving,’ which reinforces power imbalances and social inequalities (Alcoff 2007: 51). This perspective aligns with feminist epistemology’s broader concern with the role of power and prejudices in shaping both knowledge and ignorance, urging a more nuanced understanding of how both are produced and maintained in society. Feminist epistemic reflections thus highlight the importance of ER, situatedness and the active challenge to epistemic injustices. These themes are intricately woven into the fabric of feminist epistemological thought, advocating for a more inclusive, responsible and ethically grounded approach to knowledge production. In doing so, feminist epistemology reinterprets classical traditions that defined knowledge as abstract and universal. Revisiting Plato, Aristotle and Descartes, it critiques their disembodied models of knowing and recovers the ethical and relational dimensions embedded in classical conceptions of virtue and truth. This reorientation offers a critical lens to revisit modern epistemic debates – particularly the Gettier problem – by challenging the limits of analytic justification and foregrounding the ethical and contextual conditions of knowing.

RETHINKING THE GETTIER PROBLEM THROUGH ER AND FEMINIST LENSES

The process of knowing, as reimagined through feminist epistemologists in general and Lorraine Code’s framework in particular, is not merely a passive reception of facts but a creative, contextually embedded and morally accountable activity. This reconceptualisation challenges traditional epistemological models – particularly the classical tripartite definition of knowledge as justified true belief – by insisting that both knowledge and justification are shaped by epistemic as well as ethical considerations. Code’s account rests on three key claims: first,

⁵ Haslanger (1999) contends that belief holds value because it provides information in a communicable, propositional form. Since human agency is inherently social, effective action depends on the ability to articulate and justify one’s beliefs. Therefore, the value of belief lies in its role in enabling informed and socially situated agency, rather than in its abstract epistemic worth alone.

the pursuit of knowledge is essential to human life and emerges through the dynamic interactions between individuals, communities and their environments; second, knowledge is inextricably linked to the socio-historical and material contexts in which it is produced, with scientists and other knowers playing an active role in its construction; and third, individuals are not only capable of engaging with knowledge but also of shaping its very structure and direction. This approach reframes epistemology as a transformative endeavour, urging a critical re-evaluation of the questions we ask and the perspectives we adopt. Code underscores the broader implications of this view by asserting that ER has far-reaching consequences for personal agency, social engagement and political decision-making.

Feminist scholars, especially Lorraine Code, consider Gettier analysis and its aftermaths that uncovered the limitations of traditional understanding of knowledge indicated the necessity of the knower to be epistemically responsible. They establish the limitations of ungrounded abstractions in knowledge production and looks for the possibilities of authoritative engaged knowers of social and historical contexts for the enlargement of knowledge. Epistemically responsible subject is in the pursuit of active structuring of experience making use of the cognitive capacity of creative and critical synthesis in knowledge construction. In epistemic matters related to belief, situatedness, ignorance and virtues knowledge gets constructed through the effective engagement of the knower through responsible practices. ER emphasises the necessity of knowledge and epistemology has to be constructed. These elements welcome and encourage everyday cognitive experiences that are neglected by traditional epistemology and affirm the thesis that knowledge and epistemology are to be constructed. Sustaining a link between everyday micro practices affirms the reality of the construction of knowledge piece by piece which is cherished well in feminist enquiry.

Feminist perspectives enrich the analysis of Gettier problems by refining the justification process, diminishing the role of luck and fostering robust epistemic practices through communal engagement. These perspectives stress subjectivity inherent in evaluating justifications for establishing knowledge, as underscored by Gettier scenarios. These scenarios illuminate the variability of what constitutes a satisfactory justification, emphasising the necessity of diverse viewpoints in epistemic endeavours. ER, as advanced by Code, elevates epistemic practices by embracing diverse perspectives, emphasising relational and multiple selves, and nurturing a collaborative approach to knowledge. This approach effectively addresses challenges posed by Gettier problems, bolstering the resilience of epistemic justification through communal and subjective engagement. Diverse cultural or contextual settings may yield differing interpretations of justified or true beliefs, engendering a multiplicity of understandings regarding knowledge claims. Gettier cases vividly depict instances where true beliefs arise from luck rather than competence, underscoring the imperative of integrating moral and intellectual virtues to ensure that true beliefs are both justified and tethered to virtuous motivations. Virtue epistemology, with its emphasis on intellectual virtues in forming true beliefs, furnishes a robust framework for resolving the Gettier problem and furnishing a comprehensive account of knowledge acquisition. An analysis on ignorance contributes to Gettier reflections in uncovering hidden assumptions in justifications. These narratives delve into the intricate interplay between knowledge, belief and justification, elucidating situations where true beliefs stem from happenstance rather than a rigorous intellectual pursuit. Such an approach invites readers to grapple with the philosophical quandaries posed by Gettier cases, thereby enriching the discourse on knowledge and its justification.

Lorraine Code's concept of ER offers a philosophically robust response to the Gettier problem by reorienting the analysis of knowledge from abstract justification to morally and socially situated inquiry. The Gettier problem exposes the fragility of the *JTB* model, revealing that justification alone cannot eliminate epistemic luck. Feminist epistemology, through ER, explains this deficiency by showing that traditional epistemology's isolation of the knower from moral and relational contexts renders justification epistemically thin. For Code, knowing is not merely a cognitive achievement but a *situated moral practice* shaped by trust, accountability and responsiveness to others. The bridge between Gettier analysis and feminist epistemology lies in their shared critique of epistemic individualism. Gettier cases demonstrate that formal, context-free reasoning can yield true beliefs without genuine knowledge; ER exposes why this occurs – because such reasoning neglects the moral responsibilities that anchor belief formation in real contexts. In the 'Smith and Jones' scenario,⁶ for instance, Smith's failure stems not only from luck but from a lack of ER: he accepts testimony within a power-laden setting without questioning bias or reliability. ER thus re-frames epistemic failure as a moral and relational lapse, transforming Gettier-style puzzles into ethical-epistemic inquiries. Knowledge, in this view, is secured not by eliminating luck but by cultivating conscientious, context-aware epistemic practices. By integrating intellectual virtue with moral accountability, ER offers a precise and ethically grounded resolution to the Gettier challenge.

CONCLUSIONS

Lorraine Code's articulation of epistemic responsibility (ER) redefines knowledge as an ethically situated practice grounded in lived experience, moral accountability and social context. Building on but critically departing from classical philosophy, which conceived knowledge as abstract, universal and disembodied – as seen in Plato's rational idealism, Aristotle's intellectual virtue and Descartes' isolated rational subject – Code restores the moral and relational dimensions obscured in these traditions. Rejecting value-neutral epistemology, she exposes the limitations of Gettier-style analyses that detach justification from ethical and contextual concerns. Through ER, feminist epistemology demonstrates that knowledge cannot be reduced to true belief plus justification; it requires responsible engagement, humility and responsiveness to others. By linking the Gettier problem to the ethics of knowing, this study reveals that traditional epistemology's failure lies in its neglect of the moral foundations of inquiry. Code's framework thus reimagines epistemology as a contextually and ethically grounded enterprise, transforming 'knowing well' into an active, justice-oriented practice.

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⁶ In Gettier's 1963 Smith and Jones case, Smith believes that 'the man who will get the job has ten coins in his pocket,' based on the strong evidence that Jones will be hired and has ten coins. By coincidence, Smith himself gets the job and also has ten coins. His belief is true and justified, yet true only by luck, showing that the justified true belief fails to guarantee genuine knowledge.

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Episteminė atsakomybė, E. L. Gettier analizė ir jos įtaka feministinėje filosofijoje

Santrauka

Episteminės atsakomybės (EA) idėja, atsiradusi epistemologijoje, iš pradžių buvo atsa- kas į Edmundo Lee Gettier teiginius. Klasikiniai mąstytojai, reaguodami į šiuos teigi- nius, pasiūlė skirtingas episteminio pagrindimo kryptis ir sustiprino EA sąvoką. Šiame tyrime nagrinėjama EA evoliucija nuo klasikinių ištakų, reaguojant į E. L. Gettier kri- tiką. Taikant analitinį ir lyginamąjį metodus, tyrime sugretinami klasikiniai epistemo- logai, kaip antai Ernestas Sosa, Roderickas Chisholmas, Laurence'as Bonjour ir Hilary Kornblith, su feminizmo teoretikėmis, ypač Lorraine Code, siekiant atsekti, kaip mora- linė atskaitomybė, situacinės žinios ir santykinis pasitikėjimas iš naujo apibrėžia pateisi- nimą. Tyrimo rezultatai rodo, kad feministinė žinių prieinamumo (EA) samprata epis- temologiją perkelia iš formalaus, konteksto neturinčio modelio į etiškai jautrią sistemą, kurioje žinios vertinamos kaip moralinis pasiekimas.

Reikšminiai žodžiai: episteminė atsakomybė, feministinė epistemologija, pateisinimas, Lorraine Code, Edmund Lee Gettier