

# Intending to be misinterpreted<sup>1</sup>

*For the occasion of Petr Kořátko's 60th anniversary*

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**ABSTRACT:** In his paper ‘Two Notions of Utterance Meaning’, Petr Kořátko criticises Davidson’s conception of the relation between meaning and intention. He ascribes the following view (D) to Davidson: “If S makes an utterance in order to perform a certain speech act, he intends and expects that act to be assigned to the utterance in A’s interpretation”. Kořátko’s objection to (D) is that a speaker can intend to be misinterpreted. The present paper discusses this objection. It is argued that Kořátko’s main example of such an intention fails. It is also argued that although there can be cases that would be adequately described as examples of intending to be misinterpreted, they are not of the kind needed for an objection against (D).

**KEYWORDS:** Intention – meaning – misinterpretation – utterance.

## 1. Kořátko on Davidson

In his celebrated *Aristotelian Society* paper ‘Two notions of utterance meaning’ (Kořátko 1998), Petr Kořátko designs an argument, both intricate and intriguing, against a certain view of *utterance meaning*. He ascribes the view he attacks to Donald Davidson, in particular as expressed in Davidson (1986) and in Davidson (1994). I find his representation of David-

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<sup>1</sup> I am glad for this opportunity to thank Petr for almost 20 years of friendship, for many occasions of fruitful philosophical discussion and cooperation, and for his generous hosting of great conferences in Prague and Karlovy Vary.

son's views fair and shall not have any quarrel with him on that score. In this section I shall present Kot'átko's discussion of Davidson's view. In the following section, I shall examine his main line of criticism, which depends on the idea that a speaker can *intend to be misinterpreted*.

Kot'átko summarizes Davidson's view as follows:

[...] the principle of determination of meanings of particular utterances: the utterance has the propositional content  $p$  and illocutionary force  $f$  if and only if it was so meant by the speaker and understood by the audience. (Kot'átko 1998, 225-226)

Later on (1998, 230), Kot'átko specifies two Davidsonian conditions about the speaker's intentions and the audience's interpretation. Here  $S$  is the speaker and  $A$  the audience:

- Condition (a)* If  $S$  makes an utterance in order to perform a certain speech act, he intends and expects that act to be assigned to the utterance in  $A$ 's interpretation.
- Condition (b)*  $A$  interprets the utterance in the way which he believes to have been intended by  $S$ .

Condition (b) is perfectly in order. There is a question, however, with respect to Condition (a). To what extent can a speaker *intend* the audience to interpret her this way or that? By normal standards, you can intend to do only what is under your own control to achieve. You cannot intend to win a (fair) lottery. You can intend to win a race only if you are certain that you will win if you try. By the same token, you can intend  $A$  to interpret you in a particular way (assign a speech act to your utterance), only if you are certain that there is an utterance you can make that will cause  $A$  to interpret you that way. In case you are not certain, a weaker alternative appears more appropriate:

- Condition (a')* If  $S$  intends to perform a certain speech act  $I$  by means of an utterance  $u$ , then  $S$  expects that  $A$  will assign  $I$  to  $u$ .

Because you can expect something even if not being certain that it will happen, Condition (a') can be true even if Condition (a) is false. However, since Kot'átko's objection will turn out to be an objection equally much against Condition (a'), I shall set this issue aside.

Kořátko discusses two versions of intending and interpreting the use of a proper name, in his example ‘Woody Allen’. In both versions there are two possible referents to choose between,  $X$  and  $Y$ . The first version assumes that there is a standard, or real, bearer of the name,  $Y$ , while the second version just has two alternatives of equal standing.

In his treatment of the first version, Kořátko rightly assumes that speaker and hearer, in trying to conform to the two Davidsonian conditions, will take into account their beliefs about each other, including beliefs about the other’s beliefs. He shows that beliefs that ascribe higher-order false beliefs will have effects on actual intending and interpreting, under the Davidsonian assumptions.

For instance, suppose that  $S$  believes that  $W$ , the referent of the name ‘Woody Allen’, is  $Y$ , i.e. that  $W = Y (B_S p)$ , in Kořátko’s abbreviation), but believes that  $A$  believes that  $W = X (B_S B_A q)$ . Since  $S$  intends to refer to what she expects  $A$  will interpret her as referring to, she will refer to  $X$ , not to  $Y$ . Similarly, if  $S$  believes that  $A$  believes that  $W = Y (B_S B_A p)$ , but also believes that  $A$  believes that she herself,  $S$  believes that  $W = X (B_S B_A B_S q)$ , the result will be the same. For, since she believes that  $B_A B_S q$ ,  $S$  expects  $A$  to interpret her as referring to  $X$ , since she expects that  $A$  will interpret  $S$  in accordance with what  $A$  expects  $S$  to intend, which will be to intend to refer to  $X$ . And so on. Beliefs in higher-order mistakes have consequences for actual intentions and interpretations.

Note that, as Kořátko points out, this does not depend on the *truth* of these higher-order beliefs.  $S$  and  $A$  may have false higher-order belief about each other, but still adapt intention and interpretation to the effect that communicative success results. Kořátko sums up the result as follows, correctly as far as I can judge:

This shows that, according to the Davidsonian account of utterance meaning, an utterance including a proper name can be an assertion about some person  $X$ , even if the name uttered is not the name of  $X$  in the community to which  $S$  and  $A$  belong,  $S$  does not believe that  $A$  regards  $X$  as a bearer of that name (neither in ‘official’ nor in any other sense),  $A$  does not believe that  $S$  regards  $X$  as a bearer of that name,  $S$  does not believe that  $A$  believes that  $S$  regards  $X$  as a bearer of that name, etc. And the utterance has this meaning even if  $S$ ’s relevant beliefs do not correctly represent  $S$ ’s relevant beliefs and  $A$ ’s relevant beliefs do not correctly represent  $S$ ’s relevant beliefs. (Kořátko 1998, 230–231)

Is this result disastrous for the Davidsonian account? Should we rather judge communication to *fail* if *S* and *A* base their intentions and interpretations on false mutual beliefs, even if they end up with the same referent? Kot'átko does not claim so, and I think that would be an unjustified conclusion. Note that although *S* and *A* may have false beliefs about each other, these beliefs only concern attitudes about who is the *standard* referent of the name 'Woody Allen'. In case the referent *is* shared, *S* does *not* have a false belief about how *A* will interpret *S*'s utterance, and *A* does *not* have a false belief about what *S* intends to refer to. On Davidson's model, those beliefs are true. And if *S* has a rational belief about what *A* believes about *S*'s intention, that belief will be true as well, for otherwise *A* will have a false belief about *S*'s intention to refer, and the referent will not be shared. And so on. In exceptional cases, as in Kot'átko's example, the true higher-order beliefs about intentions and interpretations may be based on false higher-order beliefs about standard reference, but in general, taking into account what one's interlocutor does believe about standard reference seems like a good idea.

This is actually pretty close to Kot'átko's own conclusion, for he observes that we do get a different result if we leave standard reference out of the picture, and just focus on mutual beliefs about intentions and interpretations. This is Kot'átko's second version of the example. In the second version, the question of the standard or real referent of the name plays no role. Instead of the propositions  $W = X$  and  $W = Y$ , there are four alternatives (1998, 232):

- (*p*<sub>1</sub>) If *S* utters 'Woody Allen' (on a given occasion), he intends to refer to *Y*.
- (*p*<sub>2</sub>) *S*'s utterance of 'Woody Allen' (on a given occasion) would be interpreted by *A* as referring to *Y*.
- (*q*<sub>1</sub>) If *S* utters 'Woody Allen' (on a given occasion), he intends to refer to *X*.
- (*q*<sub>2</sub>) *S*'s utterance of 'Woody Allen' (on a given occasion) would be interpreted by *A* as referring to *X*.

Kot'átko now observes that there is no longer any room for false higher-order beliefs as in the first version, for those false beliefs all concerned standard reference. In this case, any false mutual belief would, if *S* and *A* are rational, lead to not sharing reference, just as the beliefs about intentions and interpretations in the first version. Kot'átko notes that the following belief is not consistent with Davidson's conditions:

(1)  $B_S p_2 \ \& \ B_S B_A q_1$

If (1) is true,  $S$  believes that he will be interpreted as referring to  $Y$  but *also* believes that  $A$  believes that  $S$  will intend to refer to  $X$ . But if  $S$ 's second-conjunct belief is true, and  $A$  thus expects  $S$  to refer to  $X$ , then by *Condition (b)*,  $A$  will interpret  $S$  as intending to refer to  $X$ , and so  $S$ 's first-conjunct belief is false. So, holding both beliefs conjointly is not coherent.

This looks like a welcome result for Davidson, but Kořátko has a real objection: it is possible to *intend to be misinterpreted*. This would be a direct violation of *Condition (a)*. The next section will be concerned with this idea.

## 2. Kořátko's counterexample

Kořátko's example, the *Martial Example*, is the following:

Let us imagine that Paul says to John: 'Martial wrote witty epigrams'. He hopes that John, due to embarrassing gaps in his education, will interpret him as asserting that Martial wrote witty epitaphs and that this will come to light in John's reaction: that would provide a welcome opportunity to give John a lesson in literary terminology. I think the most natural thing to say here is that Paul wants to be misinterpreted, which means: there is a discrepancy between what he wants to assert and what he wants to be taken as asserting. Then the condition (a) is not fulfilled. And Paul can very well succeed in both respects: even if he is interpreted as he wanted, we shall, I think, say that he asserted that Martial wrote witty epigrams (this is also what he is going to later explain to John). This is certainly something which the Davidsonian notion of utterance meaning does not allow us to say. Now imagine that John knows what 'epigram' conventionally means and that he also sees through the trick intended by Paul: then he will obviously interpret the utterance in the standard way, even if he knows that this is not the way John wanted him to interpret it (and it will be quite natural if he manifests to John that he understood him correctly, i.e. not as John wanted). In that case the condition (b) is not fulfilled. (Kořátko 1998, 234-235)

The questions that immediately present themselves are of course these: Is the Martial Example an example of intending to be misinterpreted? And: Is

the Martial Example an example of interpreting contrary to how you take the speaker's intention?

Let's focus on the first question. The initial point about what you can intend is clearly relevant: according to the example, Paul *hopes* that John will interpret 'epigram' as *epitaph*. It is questionable whether you can intend something to happen that you can merely hope to happen. But maybe the example can be reconstructed so as to avoid this problem. I'll set it aside.

My objection against Kot'átko's alleged counterexample is that the object of intention is misdescribed. In order that John's reaction will show "embarrassing gaps in his education", what is relevant is not *which* meaning Paul intends to express by means of 'epigram', but that he intends to express *the standard meaning* (in their speech community), whatever it is. In order that John reveal any gap in education by his interpretation, it is necessary that he does interpret 'epigram', as uttered by Paul, as expressing *its standard meaning*, whatever it is. The mere fact that Paul would intend *epigram* and John interpret the word as meaning as *epitaph* does not by itself reveal any gap in education. Without reference to standard meaning, it is a mere case of failed communication.

Taking this into account, how should the speaker's intention and the audience's interpretation be described in the Martial Example? One alternative is to distinguish between a *primary* and *secondary* intention and interpretation. We can then describe it as follows.

- (Paul)
- i) Paul primarily intends to express the standard meaning of 'epigram'.
  - ii) Paul believes that the standard meaning of 'epigram' is *epigram*.
  - iii) Hence, Paul secondarily intends 'epigram' to mean *epigram*.

We can make an analogous derivation for John:

- (John)
- i) John primarily interprets 'epigram' as having its standard meaning.
  - ii) John believes that the standard meaning of 'epigram' is *epitaph*.
  - iii) Hence, John secondarily interprets 'epigram' to mean *epitaph*.

If (Paul) and (John) are adequate descriptions of Paul's and John's linguistic attitudes in the Martial Example, then it turns out that it does not after all constitute a counterexample to Davidson's conditions. For Paul primarily intends *epigram* to mean just what he expects Paul to primarily interpret it as meaning, viz. its standard meaning, in accordance with *Condition (a)*. And John primarily interprets 'epigram' to mean exactly what John primarily intends it to mean, in accordance with *Condition (b)* (at least, this is in accordance with *Condition (b)* if John also believes Paul to intend the standard meaning, but we may assume that).

On this analysis of the Martial Example, we still have a desired secondary misinterpretation. Paul believes (John-ii), and can therefore, on the assumption of (John-i), derive (John-iii), which Paul desires to be made true, and perhaps also intends it to be made true. Does this violate Davidson's conditions?

It is unclear what Davidson would or should have said, based on his published writings. The distinction between primary and secondary meaning intention does not occur there, and is somewhat alien to his way of thinking. The distinction in Davidson (1986) between *prior theory* and *passing theory* is different, which concerns replacing one theory by another, in interpretation, regardless of whether either is standard: the prior theory might well have been an idiosyncratic scheme of interpretation for a particular speaker, even if it be replaced by a scheme that is perhaps even more idiosyncratic.

Davidson would clearly have recognized the possibility of devious calculations such as in the Martial Example, but it is not obvious how he would have related these to his views about intentions and interpretations. There is some reason to think that he would have insisted that agreement in primary intention and interpretation is what matters. One reason is that in virtually all normal linguistic communication, the primary intention is all that matters, because speakers normally directly intend to express a certain meaning, and similarly for hearers. A second reason is that a Davidsonian might insist that any desire for a misalignment between secondary attitudes of speaker and audience *presuppose* an alignment between their primary attitudes. A third reason is that secondary attitudes depend on certain background beliefs about other factors than the speaker's intention and the hearer's interpretation, in this case standard meaning, and such background beliefs did not play a significant role in Davidson's account. The conditions on intention and interpretation should then concern primary meaning attitudes.

A consequence of this choice is that, on Davidson's view, as set forth in the first Kořátko quote, and given the primary intention in (Paul) and the primary interpretation in (John), the utterance meaning of 'epigram' is its standard meaning, *epigram*. This would follow even on a variant of the Martial Example where both Paul and John are misinformed about the standard meaning (maybe Paul thinks it means *epigraph*). Is this reasonable? Let's compare it to the outcome of an alternative analysis of the Martial Example. On this analysis, the beliefs about the standard meaning only serve to motivate and explain the primary intention:

- (Paul') i) Paul desires that his primary meaning intention with respect to 'epigram' coincides with its standard meaning.  
 ii) Paul believes that the standard meaning of 'epigram' is *epigram*.  
 iii) Hence, Paul primarily intends 'epigram' to mean *epigram*.
- (John') i) John desires that his primary interpretation of 'epigram' coincides with its standard meaning.  
 ii) John believes that the standard meaning of 'epigram' is *epitaph*.  
 iii) Hence, John primarily interprets 'epigram' to mean *epitaph*.

On this alternative analysis, if both Paul and John are mistaken about the standard meaning, to the effect that both believe that it means *epitaph*, the utterance meaning, on according to Davidsonian principles, would be *epitaph*, not *epigram*. The desire to agree in intention and interpretation with standard meaning would cause them to *revise* their primary intentions and interpretations, should they learn the truth about the standard meaning, but before this has happened, they each means and interpret what they *believe* is the standard meaning, even if the standard is different from what they believe.<sup>2</sup>

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<sup>2</sup> This discussion runs parallel to the discussion of social externalism following the work of Tyler Burge (starting with Burge 1979). The original analysis corresponds to Burge's own externalism, where a speaker who defers to the community actually means what the community means, even if he is mistaken about it, and therefore mistaken about what he himself means. The second analysis corresponds to an alternative way of understanding what deference to the linguistic community amounts to: a readiness to

The alternative analysis, (Paul') and (John'), corresponds better, I think, to how ordinary speakers relate to their speech community. If this would also be the correct analysis of the Martial Example, it clearly would provide counterexamples to Davidson's principle: Paul now intends/desires John's primary interpretation to be one that does not agree with his own primary meaning intention. The question is whether it does justice to the example.

According to the example, Paul is *primarily* interested in exposing John's lack of knowledge of the *standard* meaning of 'epigram'. He also believes, correctly, that he himself knows the standard meaning, and that therefore, if he intends to express the standard meaning, John's misunderstanding Paul will be equivalent to having a false belief about the standard meaning. But in the variant scenario, where Paul himself is *wrong* about the standard meaning, John's misunderstanding of Paul will be irrelevant to the truth value of John's belief about the standard meaning. Therefore, I think the alternative analysis, (Paul') and (John'), does not really capture the scenario in the Martial Example.

Since we therefore should keep the first analysis, and the example is taken to concern Davidson's conditions with respect to primary meaning intention, Kot'atko's Martial Example is not really a counterexample. Could there be others?

### 3. Intending a misalignment of indexicals

Could there be counterexamples to Davidson's principles that do not depend, as the Martial Example does, on a discrepancy between the audience's interpretation and standard meaning? Two types of possible discrepancies come to mind. One concerns a possible misalignment in the interpretation of indexicals, and the other in disambiguation (of various kinds). These are not really different in principle, from the current perspective, and I shall focus on the indexical case.

In the use of indexicals, the speaker could aim at misleading the audience by trying to make him assign the wrong value. Consider the case where *S* writes an email to *A*, saying

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change once intentions and interpretations in the light of new information, but not an externalism about what one in fact means.

(2) I am now in Buenos Aires.

What does ‘now’ in this message refer to? Does it refer to the time of the context of *S*’s writing, or the time of the context of *A*’s reading?<sup>3</sup> Suppose that *S* is sending the email late in the evening, counting on it’s not getting read until the morning. He knows that *A* does not expect him to arrive in Buenos Aires until the morning, but in fact *S* has arrived already the evening before. He wants no questions to be asked about it, but figures it will be too dangerous to plainly lie. Therefore, he hopes that *A* will interpret *S* as referring, by ‘now’, to the time of reading, i.e. the morning. His plan is further, in case he is explicitly asked about it, to say that by ‘now’, he referred to the time of writing, i.e. the evening. Is it adequate to describe *S* as meaning *the evening*, but intending to be interpreted as meaning *the morning*, i.e. as intending to be misinterpreted?<sup>4</sup>

As with respect to the Martial Example, I think this would be an inadequate description of the example. When we use indexicals and demonstratives, we take them to refer to what is cognitively salient in the context. With demonstratives, typically but not always, an entity is made salient by means of a demonstration. The pure, or automatic, indexicals, including ‘I’, ‘here’, and ‘now’, have as default referents the speaker, the location, and the time, of the context of utterance, but in exceptional cases, the default interpretations are overridden.<sup>5</sup> In case of ‘now’, the default can be overridden e.g. in the historical present tense of narratives, and, as in the current example, in messages with an expected time delay between the speaker’s production of the utterance and the hearer’s perception. This latter case is not,

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<sup>3</sup> These alternatives in the interpretation of temporal indexicals, and especially ‘now’, are discussed in the literature on the so-called ‘Answering Machine Paradox’, typically in connection with Kaplanian semantics. For an overview, see Cohen and Michaelson (2013).

<sup>4</sup> There is a fairly wide discussion, starting with Kaplan himself, of what indexicals *really* refer to in tricky cases, in particular if it is the speaker’s intention that decides, or something else. For instance, see Gauker (2008) and Åkerman (2009). This discussion is, however, irrelevant to present concerns. The present question concerns the possibility for the speaker to combine two intentions, regardless of what the “real”, or “correct”, reference might be.

<sup>5</sup> For ‘I’ there are descriptive uses (cf. Nunberg 1993, 20–21), and in some languages, including German, the first person singular pronoun also has impersonal uses (cf. Zobel 2010), where English predominantly uses the second person.

however, a counterexample to the principle that the time referred to is the salient time. It is only that in these exceptional cases, a time other than the time of utterance is salient.

The term ‘context’ is ambiguous between the real situation of utterance and what is *cognitively relevant* in the situation of utterance. In the latter sense, it can be seen as a collection of values given to semantically relevant parameters. Kaplan (1989a) used the term in the latter sense, and made it explicit in Kaplan (1989b, 591–593). David Lewis used it in the former, a location “in physical space-time and in logical space” (Lewis 1980, 85). The need for the distinction arises because a real situation, in the sense of the objective features of the environment of a speaker or interpreter at a time, do not uniquely fix all relevant parameters.<sup>6</sup> It does not automatically determine what is cognitively salient to a speaker or interpreter, even though certain perceptible features can have a strong influence (a very big dog surrounded by small dogs is likely to be the referent of ‘that dog’ unless preceding discourse leads in another direction).

In particular, what is salient to the speaker may not be what is salient to the audience, which may be a source of misunderstanding in the use of an indexical or demonstrative. Therefore, in the collection-of-parameters sense of ‘context’, we strictly speaking need to distinguish between the *speaker’s context* and the *audience’s context*, even if speaker and audience are in the same objective situation, i.e. in roughly the same place at the same time. The need is even greater if they are not, as in the example.

The speaker refers by ‘now’ to the time that is salient to the speaker at the time of utterance,  $t_S$ . This statement be taken as an axiom concerning the relation between salience and indexical reference. Lacking an independent precise definition of *salience*, it may also be taken as part of what characterizes our notion of salience. This notion at least also involves the idea of *having in mind*; what is salient is what most strongly attracts attention in a collection of candidates.<sup>7</sup>

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<sup>6</sup> Lewis preferred the former sense because contexts have “countless features”, not given by a fixed list.

<sup>7</sup> In vision research, visual salience is regarded as the result of a combination of visual-phenomenal and visual-“semantic”, i.e. conceptually categorized, information, with the property of attracting selective attention. What does get attention does not only depend on properties of the stimulus, but also on the cognitive state. See e.g. Parkhurst, Law and Niebur (2002).

The audience interprets ‘now’ as referring to the time that is salient to the audience at the time of perception,  $t_A$ . To this we should add that both speaker and audience *presuppose* that they have the same time in mind, i.e. that  $t_S = t_A$ . If the presupposition fails, there is misunderstanding.

Applying Davidson’s conditions to indexical time reference yields the following:

*Condition (a)<sub>T</sub>* If  $S$  by ‘now’ refers to time  $t$ , he expects that  $t$  is salient to  $A$ .

*Condition (b)<sub>T</sub>* If  $A$  interprets  $S$ ’s utterance of ‘now’ as referring to time  $t$ , he believes that  $t$  is salient to  $S$ .

The idea that  $S$  in the Buenos Aires Example intends to be misinterpreted amounts to a violation of *Condition (a)<sub>T</sub>*. But this idea does not cohere with the assumptions about salience. In uttering (writing) (2) with the intention that  $A$  takes ‘now’ to refer to the time of reading,  $S$  must have the time of reading in mind. That time must then be salient to  $S$ . But with the time of reading salient in uttering the indexical, that is also what  $S$  intends the indexical to refer to. The idea of intending to be misinterpreted leads to a conflict in assumptions about the salient time.

It may be objected that  $S$  may have just a prior plan about interpretation. That is,  $S$ ’s intention about  $A$ ’s interpretation can be formed *before* the utterance, while the utterance itself only has the time of utterance as the intended referent. This would be unusual, but not impossible. However, if normal utterances, without prior plans, are made with intentions or desires about interpretation, during the time of the utterance itself, then this would hold for  $S$ ’s utterance in the Buenos Aires Example as well. If so, the prior intention is irrelevant, for it is the simultaneous intention that matters, and then the conflict would arise anyway.

This is a simple argument, and not unassailable, but a rejection needs to appeal to yet unmotivated complications, such as having multiple alternative times salient in parallel, for separate but simultaneous mental acts, or having a sequence of acts associated with a simple one-word utterance. Without very good independent reasons for such complications, they are not serious candidates. What goes for indexicals carries over, I think, *mutatis mutandis*, to lexical and structural disambiguation, and anaphora resolution.

Still, this argument leaves one possibility open: that  $S$  has a prior plan about  $A$ ’s interpretation, but at the time of writing means *nothing at all*,

since he has neither the time of writing nor the time of reading in mind. He just writes down the sentence according to his prior plan. This seems to me a description of the example that is both coherent and plausible. However, although the utterance is made with an intention do mislead the audience, it does not violate *Condition (a)<sub>T</sub>*, or *Condition (a)*, since the antecedents are false: *S* does make an utterance, but not in order to perform any speech act. He just wants *A* to interpret it as a speech act anyway.

Can *S* nevertheless be reasonably described as intending to be misinterpreted? Strictly speaking not, as long as being *misinterpreted* amounts to being interpreted in a way that diverges from what is meant, and by assumption nothing was meant. *S* can certainly be correctly described as having intended to be interpreted in a way that will *not agree* with anything that *S* will mean (on the occasion). On the other hand, to the extent that *S* does not intend to mean anything at all, he can also be described as intending to be interpreted in a way that will *agree* with everything that *S* will mean (on the occasion).

The final possibility to consider is whether the description might apply solely to *S*'s prior plan. For perhaps *S* mistakenly *believes* that he can write down sentence (2), while both meaning the evening and intending to be interpreted as meaning the morning. Doesn't *S* then, in forming this plan, intend to be misinterpreted? I find this hard to deny. If this description is correct, there can after all be states of mind to which the phrase "intending to be misinterpreted" applies. They are not, however, states of the kind Kot'átko intended.

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