How to Talk about Ineffable Things : Dignāga and Dharmakīrti on *apoha* :

If one tries to tell something of a unifying narrative as to why the philosophy of language became what it did in the system known as "Buddhist logic", the central thread must be the Yogācāra separation between language and concepts, on the one hand, and ineffable, unconceptualized real particulars on the other. To adopt a frequently used philosophical notion, Yogācāra, and logician *apoha* theorists, were unwavering subscribers to a "scheme-content" distinction: they held that we can and should make a clear and radical separation between what our linguistic-conceptual schemes create or impose upon an uninterpreted content, and that content itself, which is real and accessible only to perception and is outside the conceptual scheme and hence free of its distortions and "coloring".[1] The seemingly intractable problem in making a radical scheme-content separation, as Yogācāra want to do, is that once you've insisted that things in the world exist in a way completely outside the natures imposed by the conceptual scheme, it becomes very difficult to backtrack and still somehow account for a link-up between language/concepts and the world. Prima facie at least, it becomes extremely difficult to say why one conceptual scheme, or one description of the world, would be better or more likely to be true to the world than another. After all, all languages and concepts would seem to end up on an equal footing, i.e., having no connection with how things are.

Apoha as a Yogācāra Philosophy

Now, before we take up the ways Buddhist logicians, or *apohavādins*, nonetheless manage to talk non-arbitrarily about the world, let's briefly look at the scheme-content distinction in Yogācāra and assure ourselves that the *apohavādins are* in a significantly similar philosophical predicament. In Yogācāra terms we have the classical position on three natures (*svabhāva*), a position such as that found in texts such as Vasubandhu's *Trisvabhāvanirdeśa, Trimśika,* and in many others (including Dharmapāla and at least implicitly Asaṅga's

Bodhisattvabhūmi Tattvārthapaṭala), that linguistic-conceptual natures are "thoroughly imagined" (*parikalpita*) and hence are not real, but are superimposed (*samāropita*) on the "dependent" (*paratanta*), which is real but ineffable and is, in its own nature, outside and beyond the imagined.

Although the terminology in Vasubandhu and other authors is that of *parikalpitasvabhāva* and *paratantrasvabhāva,* the substitution of *sāmānyalakṣaṇa* (universals) for the former and *svalakṣaṇa* (particulars) for the latter is easily and naturally made, Thus, a universal X taken as an *apoha*, i.e., an exclusion of non-X, has all the "scheme-like" characteristics of the imagined natures : being an absence it is unreal and is a kind of conceptual fiction, thus supposedly enabling us to avoid acceptance of *real* universals – the system remains nominalist in the sense of recognizing only particulars (*svalakṣaṇa*) as real. Equally the *svalakṣaṇa* are the perceptual content upon which the scheme comes to bear, just as are "dependent natures" in classical Yogācāra.

I'd mentioned that this rapprochement between three natures theory and the *apoha* theory can be easily made, philosophically speaking. Indeed it was in fact explicitly made by more than one major thinker in the logicians' branch of the Yogācāra school. This is much in evidence in Dharmapāla, a sixth century grand-disciple of Dignāga, who in his *Guang bai lun shi lun* on the *Catuḥśataka*, alternates between the *parikalpita-paratantra* and *sāmānyalakṣaṇa-svalakṣaṇa* dichotomies. But it is especially clear in the Yogācāra chapter of Bhāviveka's *Madhyamakahṛdayakārikās* (MHK)*,* where an anonymous Yogācāra defends the three nature theory by relying on Dignāga's *apoha* and uses the *apoha* theory to explain how the conceptual scheme is constituted and imposed on its ineffable perceptual contents. If ever there was a reasonable doubt about the close connection between Buddhist logician's philosophy of language and the Yogācāra world view, Bhāviveka's MHK V lays that doubt to rest.

The Problem of Reference

What do we mean when we speak of "talking about" things in the world that are somehow ineffable? To put it in another way, "talking about" for Buddhists will eventually, but not immediately, lead to a

problem of reference for Yogācāra-inspired philosophers and their *apohavādin* allies. It is probably true (as has often been pointed out) that many Buddhist writers, indeed many Indian philosophers, are often ambiguous on questions of sense and reference and use terms like "what is talked about/expressed" "what is signified" (*vācya*, *abhidheya*), without clearly distinguishing between two quite different matters, viz. words directly expressing properties as their sense/meanings and words referring to things in the world via those properties that are their senses. Philosophers of language, from Patañjali to Dignāga, formulate much of their semantic theories in terms of whether general properties or particular things are "expressed" – indeed *apohavāda*, i.e., the position that words "express" some type of double negative property, is thought by its proponents to be an answer to that problem. In any case, once it has been decided that *apoha* is the answer to that longtime controversy, another and potentially different question arises for a Buddhist logician, implicitly in Dignāga, but much clearer in Dharmakīrti. That question is the following: how is it that somehow, via the intermediary of these double negative quasi-universals or in some other fashion, the Buddhist logician can come to pick out individual particular things that are in themselves supposedly ineffable? This is, in brief, the problem of bridging the scheme-content gap. It is a problem of reference and it obviously becomes especially intractable when reference is supposedly going to involve ineffable particulars, which are somehow only perceptible and not actually conceivable or describable in their own natures.

Two approaches to apoha

I would maintain that there are, broadly speaking, two approaches in *apoha* theories to bridge the scheme-content gap: what we could call "top-down" approaches and "bottom-up" approaches. By "top-down" I mean a position that would somehow maintain that it is because of some specific (and perhaps ingenious) features of the logical operators of negation in the exclusion that the *apoha* actually does pertain to particular things, even though it does not have the ontological baggage of a real universal. In short, on a top-down approach, the *apoha* would behave like a property, a sense, meaning, that belongs to the conceptual scheme but nonetheless qualifies and thus serves to "pick

out" the real particulars in the world; because of some feature of double negation we are spared commitment to there being real universals in addition to real particulars. On a "bottom-up" approach, causal chains and error are what bridge the scheme-content gap, rather than the logico-metaphysical features of a special sort of double negation. The way words link to things is thus primarily explained by the existence of a causal chain from the things to the thoughts and then the utterances of words.

The usual way in which *apoha* has been presented in the West and in classical India (at least in the writings of major non-Buddhist critics of *apoha*) is via a top-down approach, that is to say, Buddhists think that somehow some nominalist mileage is to be gained by seeing double negation, a fiction, as serving to pick out real entities that are "in their own nature" ineffable and purely particular. Thus, Karl Potter on Buddhist nominalism's elimination of commitment to universals (taking the standard Indian example of a universal, i.e., cowness):

> "Although it falsifies reality to describe it as having a certain positive character (e.g.,cowness), it does not falsify [reality] to describe it as lacking a certain negative character (e.g., non-cowness)."[2]

And Bimal Matilal:

> "Meanings, for Dignāga, are fictional constructions and they have a negative function ... to exclude the object from the class of those objects to which [the name] cannot be applied."[3]

Here's what I think would be a plausible summary of Dignāga's position. We find, in *Pramāṇasamuccaya* V, the recurrent idea that real things are indivisible unities of several aspects, X, Y, Z, etc., and that no single word can express the totality of these aspects. Thus the word "cow" expresses one aspect and "impermanent" expresses another aspect of an indivisible multi-faceted entity: no word expresses all the innumerable aspects, each word simply proceeding to isolate some aspect X in a purely negative fashion, differentiating the X (e.g., the cow or the impermanent thing, and so forth) from non-X's. It thus looks like Dignāga more or less allowed the essentials of what I'm calling a "top-down" approach: an *apoha*, a non-non-X, expressed by a word, would apply to particulars in that, by its logical

features of negation, it picks out some aspect present in the otherwise indivisible nature of these ineffable things.[4]

Dignāga's adversaries in India, e.g., Kumārila and Uddyotakara, saw him as adopting this top-down approach, replacing universals with fictional contructions in the form of double negations. And, not surprisingly, one of their main objections was to question whether a Buddhist could ever hope to gain any advantage for his nominalist project by substituting double-negationese for positive universals. Contemporary philosophers reconstructing the theory of *apoha*, such as Hans Herzberger and others, have generally sought to answer that type of question in the context of the top-down approach. In the case of Herzberger, he used some possibilities offered by Emil Post's theory of two-fold propositions to come up with what he termed a "resourceful nominalism" to explain how predicates applied non-arbitrarily to individual things, accounting for our naive semantic intuitions but without ontological commitment to universals. For Herzberger every proposition would be analysable as a pair of content and commitment – "apohist double negation" would affirm content but deny ontological commitment. Siderits has taken the relevant double negation as involving two different types of negation, so that it is the combination of the two which picks out individual, all the while staying nominalistically unengaged to universals.

Let's leave the top-down approach in order to take up what we are calling a "bottom-up" approach, one which, I would maintain, is that of Dharmakīrti. The major change that happens between Dignāga and Dharmakīrti is the use of a causal approach to link language to the world. This causal chain from particulars to perception and finally thought and language is entirely absent in Dignāga, and so constitutes a substantial evolution in the theory: indeed it is arguably a new apohavāda that Dharmakīrti has devised. We'll take up a few representative passages:

Dharmakīrti, in *Pramāṇavārttika* III, k. 53 writes:

bhāvadharmatvahāniś ced bhāvagrahaṇapūrvakam / tajjñānam ity adoṣo 'yam
"If it said that [universals, i.e., *apoha*] will lose their status of being properties of [real] entities, this is not a fault, for the cognition of the [universal] was preceded by an apprehension of the entity"

To this Devendrabuddhi comments (*Pramāṇavārttikapañjikā* P. 167b8-168a1:)

gzugs la sogs pa mthong bas bsgos pa'i bag chags la brten nas rnam par rtog pa skye ba na / rang nyid kyi gzung ba'i rnam pa la gzugs la sogs pa'i rnam pa nyid du zhen pas 'jug pa de ltar na gzugs la sogs pa mthong ba'i stobs kyis skye ba'i phyir dang / der zhen pa'i phyir dngos po'i chos yin no zhes tha snyad du bya s pa yin pa yin no // "When conceptual thought (*vikalpa*) arises in dependence upon tendencies (*vāsanā*) which were instilled due to one's having seen [particular] forms and so forth, it determines (*zhen pa = adhyavasāya*) apprehended images (*rnam pa = ākāra*) of its own as being the images of form and so forth and thus practically applies [to forms, etc.] In this way, [thought of form, etc., i.e., thought of the universal] arises [indirectly] due to the influence of seeing [particular] forms and so forth, and determines [its own images] to be those [i.e., real features of form], and therefore [for these two considerations] one does call [the universal] a property of the [real] entity."

Here is the idea: an *apoha*-universal *U* can be said to be a property of particulars *p1, p2, p3,* etc., because: (1) the thought of *U* is causally conditioned by tendencies imprinted on the mind by direct perceptions of *p1, p2, p3*, etc., these perceptions being in turn causally linked to *p1, p2, p3,* etc. (2) the mind can not distinguish between its own invented universal *U* imputed to entities and the entities themselves (which are particulars and actually lack *U*).

      We can also unpack both of Devendrabuddhi's reasons – they are also amply attested in Dharmakīrti. There are thus two parts to Dharmakīrti's theory of reference, i.e., the explanation as to how words link up with or refer to several particulars taken to be of the same kind. The theory can be seen as a version of what is usually called nowadays a "causal theory of reference", i.e., a type of theory that explains what Mr. X is referring to with such and such a word by detailing a complex and long causal chain from the object, via Mr. X's language learning and concept acquisition, to the representation of the object and then to the use of the word on a specific occasion. Dharmakīrti is not much different on that score in relying on causality for reference, although it is certainly a complicated chain that is being postulated. Mr. X sees particular things and has perceptual images (*ākāra*) of them; these images regularly cause, due to "imprinted

tendencies" on the mind, the same type of judgment, "This is an instance of U", a judgment to which an image + *apoha/vyāvrtti*, i.e., a generic image, appears; because the particular perceptual images all have the same effect in leading to the same judgment, they are all the same in their causal power and can be grouped together. The link from *apoha* to the specific word is made by speaker's speech intention (*vivakṣā*) : he/she wishes to use a specific word to express/mean such and such an *apoha*, so that it is the intention which causally conditions the utterance of the word.[5]

       This Dharmakīrtian account is obviously extremely complicated and there are possible historical reasons for that complexity that I'll have to deliberately disregard. In any case, the dominant direction of Dharmakīrti's account seems to be a *naturalistic* explanation of reference. (In what follows, I'll be speaking of a "naturalized theory of reference" in much the same way as, since W.V. Quine, we can speak of "naturalized epistemology", a theory which places the emphasis on what human beings do in knowing, referring, etc., rather than on philosophically *certifying* the rationality and justification of what they do.) He is trying to account for the cognitive events that supposedly happen when people refer to things with words, and this he does by specifying a chain of events in which each event is causally linked with the next.[6] Dharmakīrti at crucial stages in his apohavāda actually relinquishes the quest to ground or certify reference and seems to say, in effet, that we do such and such types of things and make such and such judgments, but at a certain point no more philosophically satisfying justification or certification can or need be given. For example, various particular X-images are grouped together because they all do in fact cause the same judgment (*ekapratyavamarśa*), "This is an X", and not because there is something "in them" in common.[7] The apohavādin's critic might then object that in order to certify that judgments are the same the apohavādin would have to say that they all cause the same meta-judgment, and in that case an obvious regress would loom. Dharmakīrti is aware of that regress and refuses to give a further justificatory account in terms of same meta-judgments; instead he just appeals to the fact that this is how the judgments appear to us, i.e., as all seeming to have the same content.[8] Certification seems to come to a clear end at this stage, replaced by a simple pointing out of some complex facts.

Evaluating the nominalist merits of the two approaches

Apoha theory, as time goes on, has ever-expanding uses: e.g., it provides a Buddhist account of concept formation, of the transition from perception to conceptualization and gives an attempt at a solution to logical problems like substitutivity of identicals for identicals in opague contexts. Some of this looks like psychology, even a kind of 7th Century cognitive science, and may well turn out to have considerable interest; other interesting aspects touch on familiar themes in the philosophy of logic.[9] But irrespective of whatever else Buddhist *apoha* theory is used for and might help elucidate, does it have anything that we might find promising for an intelligent nominalism? The short and swift answer: it depends on which *apoha* theory you take.

First of all, do top-down approaches, or modern reconstructions of them, actually respond to the (usual) Indian and Western anxieties about nothing of nominalist interest being gained by resorting to double-negationese? Herzberger himself acknowledged that his account would only work if a much cruder version of nominalism worked, viz. a so-called "happy nominalism" according to which universals are just *flatus vocis*, so that "Socrates is ill" is true just in case "is ill" is predicable of Socrates. If that is so, then the actual avoidance of commitment to universals would, in the end, not be due to *apoha*, but rather to more usual crude/happy nominalist strategems. What is needed, then, if this top-down *apoha* is to be more than a (slightly) non-obvious *flatus vocis* nominalism, is to find some ingenious features of double negation that themselves genuinely do the work a universal is supposed to do in grouping entities, but without the ontological baggage that nominalists abhor.

Dignāga, in *Pramāṇasamuccaya* V, did indeed think that *apoha* provided that type of stand-in for a universal.[10] But this is a hard route to go and it is far from clear that it will, in the end, deliver what is sought after, especially given Kumārila-style arguments. True, we might well have more or less simultaneous understandings of both X and non-non-X, but difficulties become acute when the *apoha* nominalist wishes to accord some type of priviledged place to understanding the double negative stand-in, taking it as what words primarily express.[11]

One might well therefore say, "So much the worse for trying to make top-down *apoha* nominalism work," and explore the merits of a

Dharmakīrtian theory, or elements of such a theory, as the best prospect for nominalism. I think that, broadly speaking, this is indeed the most philosophically promising way to go. However, there are major consequences in transforming *apoha* into a bottom-up theory in this Dharmakīrtian way, for *apoha* will no longer be a theory that ensures nominalism via double negative stand-ins. The point is this: much or all of the nominalist mileage that Dignāga supposedly gained by resorting to double negation is now going to be gained in a quite different manner, i.e., via a naturalistic explanation invoking causal chains. After all, if Dharmakīrti succeeds in linking up scheme and world via his naturalistic account and avoids commitment to real universals in such an account, why should he bother with the Dignāgean approach concerning double negation? He would have his nominalism not because of ingenious features of a double negative stand-in, but because he would supposedly have given an adequate (naturalistic) account of the link-up between scheme and world, an account in which real universals played no role. There is, thus, whether acknowledged or not, a significant rupture with pre-Dharmakīrtian positions.

Now, of course, Dharmakīrti and later writers, like Śākyabuddhi et al., would not acknowledge that rupture, and indeed made recurrent attempts to find a place for *both* double negation and causal chains in their nominalistic account of how scheme and world link. Thus the logico-metaphysical aspects of double negation come in when Dharmakīrti's commentators wish to explain how a number of particular mental images are all images of the same colour, blue, or how we can say that the resultant judgments "This is blue" are all the same judgements of something being blue, for the problem is that if there really is something like sameness we would again seem to arrive ineluctably at real universals. Same *apoha / vyāvṛtti* (exclusion) will thus be invoked to render "sameness" innocuous.

There is an air of *déjà vu* about this. Why would double negation fare better here to guarantee that one and the same X-ness could apply to many images? If it worked here, then why not in a top-down theory without any causal chain at all? Fortunately apoha-qua-ingenious-double-negation is only at most a limited part of Dharmakīrti's account of how scheme and world link, and is not, I would maintain, the main theme at all. Indeed, from Dharmakīrti and his commentators on, apoha theory expands its concerns, all the while taking on considerable hybridness due to holdovers from previous

authors. This is, alas, what makes later apoha theories often impossible to summarize in an easily digestible fashion.

In any case, the main theme in Dharmakīrti's establishment of nominalism, I would maintain, is a causal account culminating in a strategic refusal to justify metaphysically samenesses that we do in fact recognize. And this is, arguably, a promising tack. After all, there are attractive nominalisms that, in effect, take samenesses or resemblances as *primitive*, needing no further explanatory postulates, be they real universals or their ingenious replacements. As we saw previously, taking sameness as primitive seems to be what Dharmakīrti actually did in his bottom-up theory, although only when we were near the end of the causal chain and dealing with sameness of judgments. The basic standpoint, then, seems to be that at the end of the causal story, the apparent similarity between certain judgments is not an analysandum needing a further analysans; it is primitive and all the other samenesses (e.g., between perceptual images or between individual things) are explicable in terms of that "sameness of judgment."

Of course, an easy and uncharitable reading of Dharmakīrti would be that he just simply failed to provide an account for the link-up between scheme and world because (after numerous frustrating arguments in dense Sanskrit) he had no adequate logico-metaphysical analysis that would certify or justify why things should be grouped together as we think they should. At a crucial point in the theory, so the argument might go, Dharmakīrti just closed his eyes on the problem and took recourse in a type of "ostrich nominalism" –the phrase is that of D.M. Armstrong[12]— that refused to face up to explanatory duties. I think, however, that this would be wrong: like Mark Siderits I am not convinced that *this* refusal to enter the metaphysical fray was a bad thing. I think we can get an inkling of why it was even a good thing by making a difference— as David Lewis has done in answer to Armstong— between giving an *account* of sameness and giving an *analysis* of it. In the latter case, we would demand that sameness be grounded in something else, an X that is more fundamental. A satisfactory account of sameness, however, need not be that type of analysis. As Lewis points out, sameness can well be accounted for by giving it a determinate place in a well-developed theory, but as itself a primitive notion, unanalysable into further facts. Even realist theories have to at some point appeal to primitive notions, like instantiation, participation, etc. Why shouldn't nominalism?[13]

In short, a fact like sameness of judgement might well figure as primitive in a Dharmakīrti-style causal theory of how scheme and world are linked without the whole theory being charged with disingenuous shirking. If that's right, then arguably the Dharmakīrtian approach may well go in the direction of what Lewis maintains is an "adequate nominalism", providing an alternative approach to the "one over many" conundrums that supposedly force responsible thinkers to accept either real universals or come up with some kind of stand-in satisfying their metaphysical scruples. The interesting feature of this version of bottom-up apoha, if the theory is carried out consistently, would be Dharmakīrti's enlightened refusal to play that game.

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1 Such scheme-content separations, with a few variations here and there, are actually extraordinarily widespread in numerous domains of intellectual reflection, East and West. The now classic critique of various attempts to make scheme-content separations in science, anthropology, linguistics and philosophy of language, is Donald Davidson's essay, "On the Very Idea of a Conceptual Scheme", in D. Davidson, *Inquiries into Truth and Interpretation.* Oxford, 1984.

[2] K. Potter, *Presuppositions of India's Philosophies,* Englewood Cliffs, N.J., 1963, p. 188.

[3] B.K. Matilal, *Epistemology, Logic and Grammar in Indian Philosophical Analysis,* Mouton, The Hague, 1971, p. 44.

[4] Cf. the succinct account on p. 103 of Hattori ed. (1982). See also *Pramāṇasamuccaya* V, 12: *bahudhāpy abhidheyasya na śabdāt sarvathā gatiḥ / svasaṃbandhānurūpyāt tu vyavacchedārthakāry asau //* "Though that which is expressed has many facets, one does not understand them all from a word. The [word] isolates objects according to its connection." Cf. *Pramāṇasamuccayavṛtti* ad V(k.?) *śabdo 'rthāntaranivṛttiviśiṣṭān eva bhāvān āha* cited in *Pramāṇavārttikasvavṛtti* 62-63: "A word talks about entities only as they are qualified by the negation of other things." On this passage and similar passages from Dignāga's *Sāmānyaparīkṣā,* see the article

by O. Pind in S. Katsura ed., *Dharmakīrti's Thought and Its Impact on Indian and Tibetan Philosophy,* Vienna 1999.

[5] There is, however, another reason given by Devendrabuddhi and Dharmakīrti why we can refer to things: language and thought link to particular things in the world via a type of systematic error. I have taken this up in some detail elsewhere calling it "the theory of unconscious error." See p. 209-211 in T. Tillemans, *Scripture, Logic, Language: Essays on Dharmakīrti and his Tibetan Successors.* Boston, 1999. A beginning of an explanation is to say here that error is a necessary stage in the causal chain of reference in Dharmakīrti's system, especially if the theory is to preserve its thoroughly nominalist orientation. And when, at some point, the mind invents universals, it also must, in some sense, be seduced by its own inventions. The necessity for error is thus understandable, for if the universals were real and there was no error involved the nominalist project would be impossible. But equally if the mind were not seduced by its own creations it would not think that they pertain to the world.

[6] There is often an attempt to invoke "beginningless tendencies to do something", but this is again another natural fact, albeit a strange one, a little bit like Plato's anamnesis in the *Menon*.

[7] See Dharmakīrti's *Pramāṇavārttikasvavṛtti* to *Pramāṇavārttika* I, verse 109: *naiṣa doṣaḥ / yasmāt / ekapratyavamarśasya hetutvād dhīr abhedinī / ekadhīhetubhāvena vyaktīnām apy abhinnatā* "This fault [i.e., that perceptual cognitions of individuals would also all be radically distinct] does not occur. This is because the [perceptual cognitions] cause same judgments and thus the cognitions are not different; due to them being causes of the same [perceptual] cognition, the individual things too are not different."

[8] For the details in Dharmakīrti, Śāntarakṣita et al., see p. 121-126 in John D. Dunne, *Foundations of Dharmakīrti's Philosophy.* Studies in Indian and Tibetan Buddhism. Boston: Wisdom, 2004.

[9] See T. Tillemans, "Identity and Referential Opacity in Tibetan Buddhist apoha Theory," in B.K. Matilal and R.D. Evans (eds.)

Buddhist Logic and Epistemology. Studies of Classical India 7. Dordrecht: D. Reidel, 1986: 207-227.

[10] See *Pramāṇasamuccayavṛtti* to *Pramāṇasamuccaya* V.36d, where Dignāga says that the exclusion of other is what has the features usually attributed to real universals, viz. unity, permanence and application to each individual (*ekatvanityatvapratyekaparisamāpti*).

[11] Especially revealing are the later apohavādins attempts to reply to the charges of "interdependence" (*anyonyasaṃśrayatva*) levelled by Kumārila and others, for these attempts work only if the priviledged place of double negatives is sacrificed. In brief, Kumārila in *Ślokavārttika* V.83 et sq. had argued that if understanding non-non-X depended upon understanding non- X, this latter understanding in turn would be dependent upon understanding X; if this X is to be understood as a non-non-X, we would arrive at a vicious circularity where nothing could be understood. Dharmakīrti and later apohavādins, like Śāntarakṣita, tried to break out of this interdependence by saying that what X-ness is can be independently understood, just as non-X-ness can be independently understood, because we understand which things produce the judgments "This is an X" and which things do not. See, e.g. *Tattvasaṃgraha* 1063: *gāvo 'gāvaś ca saṃsiddhā bhinnapratyavamarśataḥ.* "Cow and non-cow are well-established because there are different judgements."

In short the causal account of how individual animals can be thought to have the same cow-ness is invoked to find a way out of the otherwise vicious circularity. However, if *that* works as an answer to Kumārila et al., it means that there should be nothing fundamental about the *apoha*, non-non-cow, so that it would be what we primarily understand in using the word "cow" or in thinking about cows.

[12] See D.M. Armstrong, "Against 'Ostrich Nominalism': A Reply to Michael Devitt," *Pacific Philosophical Quarterly* 61, 1980: 440-449.

[13] See David Lewis, "New Work for a Theory of Universals," *Australasian Journal of Philosophy* 61, 1983: 343-377. Reprinted in Jaegwon Kim and Ernest Sosa (eds.), *Metaphysics. An Anthology.* Oxford: Blackwell, 1999.