2013 National Baseball Arbitration Competition

Ike Davis vs. New York Mets

Submission on Behalf of Ike Davis

Team 1
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I. Introduction and Request for Hearing Decision

This brief discusses and analyzes the contributions of first baseman Ike Davis (the “Player” or “Mr. Davis”) with respect to his 2013 contract arbitration with the New York Mets (the “Club” or the “Mets”). The criteria to be discussed in such arbitration hearings is determined by the collective bargaining agreement (“CBA”) between Major League Baseball (“MLB”) Clubs and the Major League Baseball Players Association (“MLBPA”), and is laid out in the CBA under Section VI(E)(10)(a). These criteria are,

…The quality of the Player’s contribution to his Club during the past season (including but not limited to his overall performance, special qualities of leadership and public appeal), the length and consistency of his career contribution, the record of the Player’s past compensation, comparative baseball salaries …the existence of any physical or mental defects on the part of the Player, and the recent performance record of the Club including but not limited to its League standing and attendance as an indication of public acceptance …\(^1\)

Based on the subsequent CBA section, criteria shall not include either the Player’s or the Club’s financial position, press comments or similar material (excluding official awards) on the performance of the player, prior offers made by the player or club, party costs, or other sports’ salaries.\(^2\)

Mr. Davis has accumulated 2.168 years of major league service,\(^3\) making him arbitration-eligible for the first time as a “Super Two.” Under Section VI(E)(1)(b) of the CBA, a Super Two player has at least two but less than three years of service, accumulated at least eighty-six days of

\(^2\) Id. at §VI(E)(10)(b).
service in the previous season, and ranks in the top 22% of total service of the class of players that have also served between two and three years.4

Based on the criteria stated above and the evidence presented in this brief, Mr. Davis is entitled to a salary exceeding the $2.7 million midpoint established between the club and Mr. Davis’s proposed figure. Mr. Davis respectfully requests that the arbitration panel award him a salary of $3 million for the 2013 season.

II. Quality of the Player’s Contribution During the Past Season

The 2012 season was Mr. Davis’s home run year. Mr. Davis almost doubled his previous season home run record of nineteen home runs, hitting thirty-two home runs this season.5 This record also placed Mr. Davis fifth in the National League for home run production.6 During a hot streak in June and July, Davis became only the ninth Mets’ player to hit three home runs in one game.7

His at-bat per home run ratio is even more impressive at 16.2, which puts him at 3rd in the National League.8 Mr. Davis hit his first career grand slam in June of 2012, extending his then-current hitting streak to nine games and his batting average for that span to .462.9 Mr. Davis also achieved a personal record number of total bases (TB) and runs batted in (RBI) during the 2012 season, with 240 and 90, respectively.10

4 MLB Collective Bargaining Agreement, supra note 1 at §VI(1)(E)(b).
5 Baseball-Reference, supra note 3.
6 Ike Davis: Stats, Video Highlights, Photos, Bio, Mets.com, http://newyork.mets.mlb.com/team/player.jsp?player_id=477195#sectionType=career&statType=1&season=2012&gameType=%27R%27&level=%27ALL%27 (accessed 8 January 2013).
8 Baseball-Reference, supra note 3.
10 Baseball-Reference, supra note 3.
<table>
<thead>
<tr>
<th>Games Played</th>
<th>At-Bats</th>
<th>Runs</th>
<th>Hits</th>
<th>Home Runs</th>
<th>RBI</th>
<th>TB</th>
</tr>
</thead>
<tbody>
<tr>
<td>156</td>
<td>519</td>
<td>66</td>
<td>118</td>
<td>32</td>
<td>90</td>
<td>240</td>
</tr>
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</table>

### III. Length and Consistency of Player’s Career Contribution

Beginning as early as high school, Mr. Davis has been a remarkable player, consistently earning accolades and contributing to his teams’ significant success. At Chaparral High School in Scottsdale, Arizona, Mr. Davis’s team won three consecutive state titles. Mr. Davis won MVP for both the AFLAC All-American Game in 2004 and the High School All-American Game in 2005, among numerous other awards. Mr. Davis also led the Youth National Team to a gold medal in Kaohsiung, Taiwan.\(^{11}\)

Mr. Davis’s accomplishments continued at the Arizona State University. Mr. Davis gathered much attention during his career. He earned such accolades as: First Team All Pac-10 (three times), Jewish Sports Review First Team All-American (twice), ABCA First-Team All-West Region, ASU On Deck Circle Most Valuable Player, College Baseball Foundation National All-Star Lineup, Louisville Slugger National Player of the Week, Pac-10 Conference Player of the Week (consecutive weeks), and ASU All-Decade Team.\(^{12}\) Mr. Davis’s Sun Devils won two Pac-10 championships and made it to the College World Series in 2007.\(^{13}\)

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\(^{12}\) Id.

Mr. Davis was then drafted by the New York Mets in the 18th overall pick of the 2008 MLB Draft, after his junior year. At the time, he was batting an average of .394 and had sixteen home runs and seventy-three RBIs in forty-nine games. Baseball America had just ranked him as the third-best collegiate power hitter in the draft that year. Mr. Davis began his career in the Mets’ minor league organizations, from 2008 to the beginning of 2010.

Although Mr. Davis had an impressive 2010 spring training with the Mets, his major league career did not fully begin until April 19, 2010. It did not take long for Mr. Davis to show evidence of his power, hitting his first home run in merely his fifth game. He would finish the season with nineteen home runs, averaging a true distance of 415 feet. For those that try to degrade Mr. Davis’s power by alleging he has an advantage in playing at short-fielded Citi Field, this average true distance is longer than the average true distance of all home runs at all baseball stadiums that year. Mr. Davis ranked second among NL rookies in runs, doubles, on-base percentage, on-base plus slugging percentage, and third in RBI and slugging percentage.

Mr. Davis’s defensive play was also highly effective in this season. Mr. Davis was third among the National League in 2010 for range factor per game. Mr. Davis led the National League first basemen in defensive runs saved, and was only second over all first basemen that

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19 Baseball-Reference, supra note 3.
year. Mr. Davis was placed on Baseball America’s all-rookie team, and was seventh in the voting for National League Rookie of the Year.

For the above reasons, Mr. Davis quickly became a fan favorite. Within a short time, fans started bringing ‘I Like Ike’ banners into Citi Field to his games. Modell’s sports store unveiled a retro-style t-shirt in May with a tribute to the Eisenhower campaign buttons, with the proceeds going to Mr. Davis’s cause of choice, Ewing’s Sarcoma research.

In 2011, Mr. Davis was off to a similarly phenomenal start, but then on May 10, collided with third baseman David Wright and rolled his ankle. Mr. Davis only appeared in thirty-six games that season, but still ended up with thirty-nine home runs, twenty-five RBI, and a batting average of .302.

The 2012 season started slowly for Mr. Davis, between his ankle injury and his possible diagnosis of valley fever. Early in the season, he had the second-lowest batting average in the MLB, at .159. But as the summer heated up, so did he. With his first career grand slam in June, it was clear that Mr. Davis was back to his prior, powerful self.

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26 Baseball-Reference, supra note 3.
IV. Past Player Compensation

Mr. Davis has earned just barely more than the MLB minimum salary in his past two years of MLB playing time. Mr. Davis’s contributions to the team far outweigh his current pay, qualifying him for a much higher salary.29

<table>
<thead>
<tr>
<th>Year</th>
<th>Pay</th>
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<tr>
<td>2011</td>
<td>$432,000</td>
</tr>
<tr>
<td>2012</td>
<td>$506,690</td>
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</table>

V. Comparative Baseball Salaries

The New York Mets have enjoyed the contributions of Ike Davis for three seasons and deserves to be properly compensated for these contributions. Ike’s playing is similar to other players who have been compensated at or above his request for $3 million. He is a classic power hitter and should be compensated as one.

Davis is similar to Jason Loney after his 2010 season, Mike Jacobs after his 2008 season, and Mark Reynolds after his 2010 season. Davis’s 2012 season numbers, especially batting average, are a bit deceiving due to the Valley Fever he suffered in the beginning of the season. His batting average for April was .185 and was .154 in May. It significantly recovered once he was healthy during the rest of the season (June .264, July .221, August .287, September .228, October .333). Therefore, Davis's illness and resulting slow start to the season should be taken into consideration when comparing him to other players.30

29 Salary figures found on Baseball-Reference, supra note 3.
30 Baseball-Reference, supra note 3.
James Loney

In the 2011, Loney, a first baseman, signed a contract for $3.1 million in compensation for his performance during the 2010 season, in his first year that he earned above the league minimum. Loney had a batting average (“BA”) and on base percentage (“OBP”) that were higher than Davis’ (.281 and .357) but had lower slugging percentage (“SLG”) and on base plus slugging (“OPS”) (.399 and .756). He also had significantly fewer home runs than Davis, 13 compared to 32. Both players had similar fielding percentages as well with Loney at .995 and Davis at .994. Even though some of Davis’s measures of performance are not as strong as Loney, he is a big time hitter and is asking below what Loney received. Moreover, the midpoint is much lower than Loney’s salary.31

Mike Jacobs

In 2009, Mike Jacobs a first baseman in his first year as arbitration eligible was awarded a $3.275 million contract in response to his 2008 season. Jacobs had similar numbers to Davis in BA (.247 to .227), slightly higher numbers in SLG (.514 to .462) and OPS (.812 to .771), and a lower OBP (.299 to .308). The two also had a similar number of RBIs (93 to 90) and an identical number of homeruns (32). Davis had a significantly better WAR (wins above average) than Jacobs. In fact, Jacobs had a negative WAR at -2.2 with Davis have a positive WAR of 0.7. Davis was better in fielding with a fielding percentage of .994 compared to Jacobs who had a fielding percentage of .988. Additionally, Jacobs had a negative Rtot, which measures the number of runs above or below average the player was worth based on the number of plays made. Davis had an Rtot of 3 meaning that he performed better than the average player while Jacobs performed below that. This statistic and WAR are important indications of how valuable

the player is compared to other players. While Davis is a “super two” and Jacobs was not, Davis is at the very least an equally valuable player to Jacobs if not more valuable. Jacobs was awarded $3.275 million after his season and Davis is only asking for $3 million with the midpoint being significantly lower than Jacobs’s salary.  

Mark Reynolds

In 2011, Mark Reynolds earned $5.3 million in his first year as an arbitration eligible player. He was third year arbitration eligible so he had played more than Ike Davis has but his salary is also significantly higher than what Davis is requesting. Both players are power hitters and outside infielders. In 2010, Reynolds had very similar statistics to Davis. His BA, SLG, and OPS were lower (.198, .433, and .753) that Davis’s and his OBP was slightly higher (.320). Reynolds also had a lower fielding percentage at .951 (on third base). Both players had an identical number of homeruns at 32 and Reynolds had fewer RBIs at 85. Reynolds made significantly more money than what Davis is requesting and had a comparable first arbitration eligible year.

Overall, Ike Davis is at least as valuable of a player as James Loney, Mike Jacobs, Corey and Mark Reynolds and is asking for less money than they received. Davis had a strong season despite a slow start to the season due to a debilitating illness. He deserves the $3 million for his significant contributions to the Mets. 

33 1,000 for the five games he played at first base
Table 3: Comparable Players

<table>
<thead>
<tr>
<th></th>
<th>OBP</th>
<th>BA</th>
<th>SLG</th>
<th>OPS</th>
<th>HR</th>
<th>WAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ike Davis</td>
<td>.308</td>
<td>.227</td>
<td>.462</td>
<td>.771</td>
<td>32</td>
<td>0.7</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>James Loney</td>
<td>.357</td>
<td>.281</td>
<td>.399</td>
<td>.756</td>
<td>13</td>
<td>1.8</td>
</tr>
<tr>
<td>(2009)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mike Jacobs</td>
<td>.299</td>
<td>.247</td>
<td>.514</td>
<td>.812</td>
<td>32</td>
<td>-2.2</td>
</tr>
<tr>
<td>(2008)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Mark Reynolds</td>
<td>.320</td>
<td>.198</td>
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<td>(2010)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

VI. Existence of Physical and Mental Defects

While Mr. Davis’s 2011 season was negatively affected by injuries and illness, he is currently not showing signs of any lingering problems. His ankle injury did not require microfracture surgery, and in November he was quoted as saying it had been good for “quite a while.”

Mr. Davis’s diagnosis of valley fever could have had a much less favorable outcome. The fungal infection of the lungs caused Mr. Davis to avoid “extreme fatigue” and may have caused his early 2012 hitting slump. Luckily, it did not sideline him fully for long and he has fully recovered from the infection. Now that his two previous ailments are healed, Mr. Davis shows no signs of physical or mental defects.

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36 Jaslow, supra note 27.
VII. Recent Performance of the Club

At the time of Mr. Davis’s major league debut, the New York Mets were in a bit of a slump. In 2009, the Mets opened Citi Field, an exciting event for the team. Yet due to a rash of injuries, the team went 70-92 and ended fourth in the NL East. The 2010 season was not much better, with a higher record of 89-73, but still a fourth-place finish. The team fired their manager and a general manager at the conclusion of that season, and hired Terry Collins and Sandy Alderson, respectively, to replace them. The next two seasons yielded records of 77-85 and 74-88, respectively and ended with a four-place finish as well.

Looking at Mr. Davis’s records, however, the team has a brighter picture. Mr. Davis’s 2010 record was 74-73. This would have yielded a winning percentage of .503, which would have placed them third in the NL East. The 2011 season was obviously not very productive for Mr. Davis, but he rebounded in the 2012 season. The team’s win-loss record for Mr. Davis’s appearances was 74-82. This would have yielded a percentage of .474, better than the team’s .457 percentage that season.

VIII. Conclusion

Mr. Davis has shown both current skills and a high potential for growth. Based on his statistics and comparable current players, Mr. Davis has showed he qualifies for a high salary, above the midpoint between the team’s figure and his proposal.

40 Baseball-Reference, supra note 3.