2013 National Baseball Arbitration Competition

**Ike Davis v. New York Mets**
Submission on Behalf of Ike Davis
*Midpoint: $2.7 million*
*Submission by: Team 10*
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I. Introduction and Request for Arbitration Hearing Decision

The following brief will discuss relevant statistics, player attributes, team attributes, awards, and other relevant factors regarding the playing career of 25-year-old first baseman Ike Davis (“Mr. Davis”) of the New York Mets Baseball Club (the “Club,” or the “Mets”). The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) between the 30 MLB teams and the MLB Players Association will govern the arbitration proceeding and sets forth the criteria which will be considered in this arbitration hearing. According to Article VI, Section E, Part 10(a-b) of the CBA, the criteria to be considered includes: (1) the quality of Mr. Davis’s contribution to the Mets last season, including, but not limited to his overall performance, special qualities of leadership, and public appeal; (2) the length and consistency of Mr. Davis’s career contributions; (3) the record of Mr. Davis’s past compensation; (4) comparative baseball salaries; (5) the existence of any physical or mental defects on the part of Mr. Davis; and (6) the recent performance of the Mets, including but not limited to, its League standing and attendance as an indication of public acceptance.\(^1\) The following evidence will not be admissible during the proceedings: (1) the financial position of the Mets and Mr. Davis; (2) press comments and other similar material on the performance of the Mets or Mr. Davis; and (3) offers made by either party prior to arbitration.\(^2\)

The final team offer in this arbitration matter is for $2,400,000. The final player request is $3,000,000, thus, the midpoint, and the essential figure in this arbitration is $2,700,000. In accordance with the CBA, summarized above, this brief will only include such information that is relevant and permitted. Mr. Davis respectfully asks that this panel carefully consider all of the

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\(^2\) [Id.](http://mlb.mlb.com/pa/pdf/cba_english.pdf)
information included below. The arguments and analysis will demonstrate Mr. Davis is entitled to receive the $3,000,000 requested.

II. Quality of Mr. Davis’s Contribution During the Past Season

Mr. Davis entered the 2012 season with high expectations after missing the latter part of 2011 with an ankle injury. Unfortunately, one week into Mets spring training, Mr. Davis was diagnosed with Valley Fever. Valley Fever is a fungal infection that can result in extreme fatigue. In 2009, Arizona Diamondbacks first baseman Connor Jackson was diagnosed with Valley Fever and was so weak and tired from the disease that he was only able to play 30 games the entire season. Mr. Davis, however, played through the illness, participating in 156 of the Mets 162 games, which ranks him second among National League first basemen for games played.

Whether it was the Valley Fever, rust from missing so much of 2011, or a combination of both, Mr. Davis struggled through the first two months of the season. After a June 8th game against the New York Yankees in which Mr. Davis went 0-3 with 2 strikeouts, his batting average had fallen to .158. To make matters worse, the power Mr. Davis had previously shown was also non-existent. Following the June 8th game, Mr. Davis had only 5 homeruns, leading to a .273 slugging percentage. Then, in an incredible resurgence, Mr. Davis showed the power and talent which had led the Mets to draft him in the first round. From that point on, Mr. Davis hit

4 Id.
6 MLB, “Statistics,” http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mm_mlb_stats#elem=[object+Object]&tab_level=child&click_text=Sortable+Player+hitting&sectionType=sp&statType=hitting&page=1&ts=1357354746058&team_id=&playerType=ALL&sortColumn=g&sortOrder=%27desc%27&extended=0&position=%273%27
27 homeruns over the final 100 games of the season while maintaining a .265 batting average and incredible .913 OPS. Only two other players in baseball hit that many homeruns over the same period while also keeping that high of an OPS: Miguel Cabrera and Ryan Braun. To put Mr. Davis’s production into perspective, Miguel Cabrera won the American League Most Valuable Player Award, as well as the first Triple Crown since 1967, and Ryan Braun finished second in the National League MVP voting.

Table 1: Ike Davis 2012 Statistics

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<th>RBI</th>
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<tbody>
<tr>
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<td>56</td>
<td>201</td>
<td>183</td>
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<td>5</td>
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<td>18</td>
<td>.507</td>
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<td>Post June 8</td>
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<td>336</td>
<td>.265</td>
<td>27</td>
<td>69</td>
<td>43</td>
<td>.913</td>
</tr>
<tr>
<td>Total</td>
<td>156</td>
<td>584</td>
<td>519</td>
<td>.227</td>
<td>32</td>
<td>90</td>
<td>61</td>
<td>.771</td>
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</table>

Even with his slow start, Davis’s 32 homeruns led the Mets and ranked him fourth among MLB first basemen, as well as fifth among all National League hitters. David Wright hit the second highest number with 21, 34% less than Davis hit throughout the 2012 season. In fact, Mr. Davis’s 32 homeruns accounted for 23% of the homeruns hit by the Mets as a team for the entire season despite the fact that he hit only 5 through the first 56 games. Mr. Davis’s 90 RBIs also ranked 2nd on the team, only 3 behind third baseman David Wright. For the season, Ike

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8 Id.
10 MLB, “Statistics,” [http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mn_mlb_stats#elem=[object+Object]&tab_level=child&click_text=Sortable+Player+hitting&sectionType=sp&statType=hitting&page=1&ts=1357355227988&team_id=&playerType=ALL&sortColumn=hr&sortOrder=%27desc%27&extended=0&position=%27%27](http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mn_mlb_stats#elem=[object+Object]&tab_level=child&click_text=Sortable+Player+hitting&sectionType=sp&statType=hitting&page=1&ts=1357355227988&team_id=&playerType=ALL&sortColumn=hr&sortOrder=%27desc%27&extended=0&position=%27%27)
11 MLB, “Statistics,” [http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mn_mlb_stats#elem=[object+Object]&tab_level=child&click_text=Sortable+Player+hitting&sectionType=sp&statType=hitting&page=1&ts=1357355351668&team_id=121&playerType=ALL&sortColumn=hr&sortOrder=%27desc%27&extended=0&position=](http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mn_mlb_stats#elem=[object+Object]&tab_level=child&click_text=Sortable+Player+hitting&sectionType=sp&statType=hitting&page=1&ts=1357355351668&team_id=121&playerType=ALL&sortColumn=hr&sortOrder=%27desc%27&extended=0&position=)
12 Id.
Davis finished in the top 10 among all MLB first basemen in games, homeruns, RBIs, and walks.  

### III. Length and Consistency of Career Contributions

Table 2: Ike Davis Career Statistics

<table>
<thead>
<tr>
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<th>AB</th>
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<th>HR</th>
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<td>523</td>
<td>.264</td>
<td>19</td>
<td>71</td>
<td>72</td>
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<td>2011</td>
<td>36</td>
<td>149</td>
<td>129</td>
<td>.302</td>
<td>7</td>
<td>25</td>
<td>17</td>
<td>.925</td>
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<tr>
<td>2012</td>
<td>156</td>
<td>584</td>
<td>519</td>
<td>.227</td>
<td>32</td>
<td>90</td>
<td>61</td>
<td>.771</td>
<td>16.2</td>
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</tbody>
</table>

Mr. Davis was originally drafted by the Mets 18th overall in the first round of the 2008 MLB draft after becoming a two-time All-American at Arizona State University. In 2009, his first full season of professional baseball, Mr. Davis was named the Mets Organizational Player of the Year. Mr. Davis hit a team best .480 with 3 homeruns in spring training the following year, but he began the season playing with AAA Buffalo. He played only 10 games in the minor leagues before being called up to the Mets on April 19th. Davis had a fantastic rookie campaign, finishing seventh in the Rookie of the Year voting. Despite not being with the team the entire season, Mr. Davis still finished second among NL rookies in runs, doubles, walks, extra-base hits, on base percentage, and OPS. His 19 homeruns and 71 RBIs tied him for third among all NL rookies. Mr. Davis also set and tied many Mets franchise records during his 2010 season. He set the rookie record for total bases with 230 and tied the rookie record for walks and

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13 Id.
16 Id.
17 Id.
19 Id.
20 Id.
extra base hits. He is second all-time to only Darryl Strawberry in both homeruns and RBIs by a Mets rookie.\textsuperscript{21}

Mr. Davis’s sophomore season began even better than his rookie year before it was unfortunately cut short by injury. Davis opened 2011 by setting a Mets record with at least one RBI in 9 of his first 10 games.\textsuperscript{22} A month into the season Mr. Davis was hitting over .300 with an OPS of .925.\textsuperscript{23} To put this into perspective, Buster Posey, the 2012 NL MVP, finished the season with an OPS of .957, only .032 points above Davis’s 2011 number.\textsuperscript{24} He was also averaging a homerun every 18.4 at-bats, a huge improvement from his 2010 average of a homerun every 27.5 at-bats. Mr. Davis improved even more on this number in 2012, increasing to a homerun every 16.2 at-bats. There is no reason to think he would not be able to continue performing at this pace.

Unfortunately, on May 10 Mr. Davis collided with third basemen David Wright during a routine infield pop-up.\textsuperscript{25} He was initially diagnosed by Mets’ doctors as having an ankle sprain, but after it continued to keep him out of the lineup the diagnosis was changed to a bone bruise.\textsuperscript{26} It was finally determined Mr. Davis had cartilage damage in his ankle, which kept him out for the remainder of the 2011 season.\textsuperscript{27}

IV. Past Player Compensation

\begin{thebibliography}{99}
\bibitem{21} Id.
\bibitem{22} Id.
\bibitem{23} Baseball-Reference, “Ike Davis,” \url{http://www.baseball-reference.com/players/d/davisik02.shtml}
\bibitem{24} Baseball-Reference, “Buster Posey,” \url{http://www.baseball-reference.com/players/p/poseybu01.shtml}
\bibitem{25} The Warren Reporter, “Mets’ Ike Davis is still baffled by ankle injury,” \url{http://www.nj.com/mets/index.ssf/2011/08/mets_ike_davis_is_still_baffle.html}
\bibitem{26} Id.
\bibitem{27} ESPN, “Ike Davis still recovering from ankle woes,” \url{http://espn.go.com/blog/new-york/mets/post/ id/36491/ike-davis-recovering-well-from-ankle-woes}.
\end{thebibliography}
Because his contract was purchased partway through the 2010 season, Mr. Davis’s 2010 salary is not reported. It can be assumed he earned the league minimum his first season after being called up. Mr. Davis then earned $432,000 in 2011 before receiving a slight pay increase to $506,690 in 2012. Under the team’s exclusive control for the first three years of his career, Mr. Davis has been paid as little as possible by the Mets. Having accumulated enough service time to become arbitration eligible as a “Super Two”, Mr. Davis may enter arbitration prior to the standard three years of service.

V. Comparative Baseball Salaries

<table>
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<td>584</td>
<td>519</td>
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<td>32</td>
<td>90</td>
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<td>16.2</td>
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<td>Morales Platform</td>
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<td>193</td>
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*Morales received $2,975,000 following his 2010 platform season.

Kendrys Morales (“Mr. Morales”), a first baseman for the Los Angeles Angels, compiled career statistics very comparable to Mr. Davis entering his first year of arbitration eligibility. However, Mr. Morales sustained an ankle injury in May of 2010 which required surgery. The surgery kept him out of the remainder of his platform season, as well as the duration of the 2011 season. For their respective careers, Mr. Davis has more games played, plate appearances, and at-bats than Mr. Morales. Furthermore, it is important to note Mr. Morales has only exceeded 215 at-bats in one season, and it has taken him almost five seasons to reach 1240 PAs. Mr. Davis has 1334 PAs in under three seasons, which shows that he is much more reliable as an everyday player. While Mr. Morales has a higher batting average, Mr. Davis makes up for the

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lower average by displaying more patience at the plate, evidenced by the fact that he has almost
twice as many walks for his career. The result is nearly identical statistics in the main power
categories: homeruns, RBIs, and OPS. They both also have a nearly identical at-bat to homerun
ratio for their career.

A player’s platform season plays a huge part in determining his future salary through
arbitration. When comparing Mr. Davis’s and Mr. Morales’s platform years, there is no question
Mr. Davis made a much larger contribution to his team. Mr. Davis played in over three times as
many games, had 373 more PAs, hit 21 more HRs, and drove in 51 more runs. Following his
2010 season, Mr. Morales received a contract for $2,975,000--$275,000 over the midpoint of Mr.
Davis’s request and the Mets’ offer. Because of the similarity of their career numbers--and his
extremely more productive platform season--Mr. Davis is much more deserving of his
$3,000,000 request, rather than the $2,400,000 offered by the Mets.

Table 4: Comparative Hitting Statistics between Ike Davis and Mike Jacobs

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<tr>
<td>Platform</td>
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<td>519</td>
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<td>32</td>
<td>90</td>
<td>61</td>
<td>.771</td>
<td>16.2</td>
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<tr>
<td>Career</td>
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<td>1472</td>
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<td>80</td>
<td>247</td>
<td>122</td>
<td>.816</td>
<td>18.4</td>
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*Jacobs received $3,275,000 following his 2008 platform season

Mike Jacobs (“Mr. Jacobs”) was first baseman for the Florida Marlins during his platform
year in 2008. Mr. Davis and Mr. Jacobs had nearly identical statistics in their platform seasons.
They hit the same number of homeruns (32) and drove in almost the same number of runs (90
and 93, respectively). While Mr. Jacobs had a slightly higher batting average, hitting .020 points

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30 All statistics have been taken from baseball-reference.com. Baseball-Reference, “Ike Davis,”
higher, Mr. Davis had 65 more at-bats and was able to play in 15 more games (156 to 141). Mr. Davis also proved himself to be a much more patient hitter, drawing 69% more walks than Mr. Jacobs.

Mr. Jacobs does have 277 more plate appearances for his career, but the similarity in their career OPS (.797 and .816) show the two players’ contributions to their respective teams in those at-bats are comparable. Furthermore, following his 2008 season, which was almost identical to Mr. Davis’s platform year, Mr. Jacobs received a contract for $3,275,000. This contract is $275,000 more than the $3,000,000 requested by Mr. Davis and $575,000 more than the midpoint currently at discussion. Based on the similarities in performance, Mr. Davis is more than deserving of a $3,000,000 salary next season.

Table 5: Comparative Hitting Statistics between Ike Davis and Mike Adam LaRoche

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<td>90</td>
<td>61</td>
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<td>LaRoche Career</td>
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<td>65</td>
<td>213</td>
<td>121</td>
<td>.841</td>
<td>19.5</td>
</tr>
</tbody>
</table>

*LaRoche received $3,200,000 following his platform 2006 season.

Adam LaRoche (“Mr. LaRoche”) was first baseman for the Atlanta Braves when he became arbitration eligible. While Mr. LaRoche has slightly better numbers, he still provides a very strong comparable to Mr. Davis. During their platform seasons, both players hit the same number of homeruns and drove in the same number of runs. The only significant difference between the two players’ seasons is Mr. LaRoche’s higher batting average, which in turn led to

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his higher OPS. More importantly however, are the two players’ nearly identical power numbers.

Mr. Davis’s and Mr. LaRoche’s career statistics are even more similar than their respective platform years, with Mr. LaRoche having the slight edge. In 81 more plate appearances Mr. LaRoche hit .022 points higher, hit 7 more homeruns, and drove in 27 more runs while drawing 29 less walks. In his first year of arbitration eligibility Mr. LaRoche signed a contract for $3,200,000. This contract is $200,000 more than the $3,000,000 Mr. Davis has requested, but more importantly is $500,000 more than the midpoint between Mr. Davis’s request and the Mets’ offer. The strong similarities between both the platform and career statistics of the two players show Mr. Davis is much more deserving of the $3,000,000 he has requested rather than the $2,400,000 the Mets have offered.

VI. Existence of Physical and Mental Defects

Mr. Davis was sidelined for much of 2011 with an ankle injury received in a collision with third baseman David Wright. He was then diagnosed with Valley Fever at the start of 2012 spring training. Mr. Davis’s incredible second half to the 2012 season shows he has moved past both those problems. Neither present any concern moving forward, and therefore there are no physical or mental defects that should have any impact on his arbitration decision.

VII. Conclusion

Ike Davis enjoyed a breakout season in 2010, providing the Mets hope they had found a franchise first baseman. The numbers he put up before getting injured in 2011 only raised

33 Id.
Davis’s expectations. Although he had an incredibly disappointing start to the 2012 season, he put up MVP caliber numbers over the final 100 games while also displaying the durability required of an everyday player. Comparing Mr. Davis to similar players clearly shows he is deserving of a salary in excess of the $2,700,000 midpoint. Mr. Davis put up a platform season far exceeding that of Kendrys Morales, who received a $2,975,000 salary in his first year of arbitration. Mr. Davis had an incredibly similar platform season as compared to Mike Jacobs’ and, although Mr. Jacobs has slightly higher career numbers, he also received a contract worth $3,275,000 following his first year of arbitration, a salary far in excess of the $2,700,000 required to award Mr. Davis a salary of $3,000,000. Finally, aside from batting average, Ike Davis and Adam LaRoche had nearly identical platform seasons as well as very similar career statistics. Adam LaRoche received $3,200,000 in his first year of arbitration, $500,000 more than the $2,700,000 required to award Mr. Davis his request. For these reasons we ask the arbitration panel to find for Ike Davis and award him a salary of $3,000,000.