2013 NATIONAL BASEBALL ARBITRATION COMPETITION

Ike Davis v. New York Mets
Submission on Behalf of the New York Mets
Midpoint: $2.7 million
Submission by: Team 12
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Mets360, http://mets360.com
I. Introduction and Request for Hearing Decision

This brief analyzes relevant contributions of the playing career of Ike Davis (“Mr. Davis”), first baseman for the New York Mets (the “Club,” or the “Mets”), for an arbitration hearing governed by the Major League Baseball Collective Bargaining Agreement (“CBA”). 1 Under CBA Section VI (F), Part 12(a)-(b), the established criteria to be considered in this arbitration hearing in determining the Player’s salary includes: (1) the quality of Player’s contribution to the Club during the past season – including, but not limited to, his overall performance, special qualities of leadership, and public appeal; (2) the length and consistency of his career contributions; (3) his past recorded compensation figures; (4) comparative baseball salaries; (5) the existence of any mental or physical defects on the part of the Player; and (6) recent performance of the Club. 2 Mr. Davis has reached 2.168 years of Major League service, which entitles him to file a request for this first arbitration as a “Super Two.”

Mr. Davis has shown signs of great potential, and the Mets see him as a valuable member of their team; however, the Mets are concerned with his lack of consistency at the plate. Based on the evidence mentioned in this brief and in oral argument, Mr. Davis is fairly entitled to receive a salary below the $2.7 million midpoint between the Club’s offer and his own. The Mets respectfully request that the arbitration panel award Ike Davis $2.4 million.

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

In Mr. Davis’s two-plus years as first baseman for the Mets, he has undoubtedly proven himself as a valuable commodity for the Club. His appearance on Baseball America’s All-Rookie team and his seventh place finish for Rookie of the Year in 2010 are both well deserved

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2 Id. at §12(a)
based on his performance in 2010. Further, his National League fifth-best 32 homeruns in 2012 are undoubtedly a sign of good things to come in Davis’s future as the Mets’ first baseman. Given this success in his young career, the Mets wish to reward Davis with a substantial increase in compensation for the 2013 season. However, under-performance in his 2012 campaign shows a lack of consistency that needs to be corrected before a more substantial raise may be awarded.

In his platform season of 2012, Mr. Davis finished the year with significant deficiencies in crucial statistical batting categories: batting average (AVG), on-base percentage (OBP), on-base percentage plus slugging percentage (OPS), walks, hits, and doubles. Compared to his career averages, Davis’s 2012 season totals showed deficits of .020 points in AVG, .028 points in OBP, and .027 points in OPS. He also walked 11 fewer times, hit safely 23 fewer times, and hit 6 fewer doubles than his career averages project. Besides his career best 32 homeruns, the only surplus of career averages among commonly kept statistics is minimal, including seven fewer strikeouts, one additional RBI, and a .001 improvement in slugging percentage (SLG).

Opposite the trend of his platform season, Davis excelled in 2010, his rookie season, as well as the first 36 games of 2011. Following an ankle injury in June 2011, he unfortunately missed the remainder of that season – more than 75 percent of that entire season – and subsequently struggled to regain momentum at the plate in the first 56 of the 2012 season. Although he finished the season showing signs of improvement, his early slump lasted more than one-third of the Mets early 2012 season.

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4 Id.
5 Id.
From Opening Day through June 8 – encompassing 56 games – Mr. Davis’s AVG sunk to an unsatisfactory .158 with an OPS of only .507 and 59 strikeouts.\(^7\) If these numbers had stayed consistent through the entire 162 game season, Davis would have ranked 378th in AVG, 331st in OPS, and 3rd in most strikeouts among all National League batters.\(^8\) Fortunately for both Davis and the Mets, these statistics did improve over the remainder of the 2012 season, but this extended slump exemplifies the lack of consistency shown by Davis in the early stages of his career. Although he played in more games than any other National League first baseman, Davis finished the 2012 campaign ranked 28th in batting average, 14th in OPS, and 25th in OBP among all players in that same category. His 141 strikeouts are the 2nd highest among National League first basemen, 6th highest among all MLB first basemen, and 27th most in all of Major League Baseball.

### III. Length and Consistency of Career Contributions

Following an illustrious playing career at Arizona State University, the Mets selected Davis in the first round of the 2008 amateur draft. After two seasons in the Minor Leagues, including standout performances in both High-A St. Lucie and Double-A Binghamton in 2009, Davis began 2010 in Triple-A Buffalo. He made his debut for the Mets on April 19, 2010, with a 2-for-4 performance in a 6 – 1 win over Chicago. Davis stayed hot through May and June, maintaining an AVG between .270 and .290, with an OPS hovering in the .800s.\(^9\) Albeit a slight statistical dip in July and early August, Davis’s numbers remained steadily impressive through the end of the 2010 season. Finishing with a .264 AVG, .791 OPS, Davis was awarded a place

\(^7\) Id.
\(^8\) MLB.com Sortable Stats [http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mm_mlb_stats](http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mm_mlb_stats)
on Baseball America’s All-Rookie team\textsuperscript{10} and finished seventh in voting for the National League Rookie of the Year Award.\textsuperscript{11}

Davis began the following year on a hot streak that would rival any of his professional career. Although playing in only 36 games, he hit an impressive .302 AVG while accumulating a .543 SLG and a .925 OPS. If this performance was maintained through a 162 game season, Davis would average 112 RBI, 31 HR, 76 BB, and 175 hits – all above his career averages. Further, when compared to all Major League first basemen using his 162 game average for 2011, Davis would have finished ranked 4th in hits, 5th in runs scored, 5th in doubles, 5th in homeruns, 4th in RBI, 4th in AVG, 8th in SLG, and 6th in OPS, among all MLB first basemen.

Unfortunately this career year came to an abrupt end after only 36 games played. While chasing a pop-up on May 10, Davis collided with third baseman David Wright in front of the mound at Coors Field in Denver.\textsuperscript{12} He suffered cartilage damage in his ankle, but fortunately the injury did not require microfracture surgery, as was originally feared.\textsuperscript{13} The injury did, however, sideline Davis for the remainder of the 2011 season. He began his rehabilitation in early September 2011, continuing to work through the off-season.

IV. Existence of Physical or Mental Defects

The Club’s primary concern for Davis’s health stems from that ankle injury that kept him from over three-fourths of the 2011 season. In September of that year, Davis told ESPN New York’s Adam Rubin that he expects some residual issues for the remainder of his career. He

\textsuperscript{10} http://www.baseballamerica.com/today/majors/awards/rookie-of-the-year/2010/2610794.html
\textsuperscript{11} http://www.baseball-reference.com/awards/awards_2010.shtml#NLroy
\textsuperscript{12} http://www.nytimes.com/2011/06/23/sports/baseball/mets-athletics-davis-injury.html?_r=0
sited likely arthritis issues and the probability of having to manage discomfort in his coming playing years. "There's going to be some effect of this later in life," Davis said.\textsuperscript{14}

While dealing with rehabilitating his ankle injury from March 2011, illness kept Davis from any significant Spring Training work. Prior to the start of the 2012 season, Davis was diagnosed with Valley Fever, a “fungal infection caused by coccidioides (kok-sid-e-OY-deze) organisms. It can cause fever, chest pain and coughing, among other signs and symptoms.”\textsuperscript{15} Combined with the ankle injury, the bout with Valley Fever could provide an explanation for his poor start in 2012, but regardless, a more consistent performance from Davis for an entire season is necessary for such a relatively high asking price, in what will only be his third full year of Major League play.

\textbf{V. Past Player Compensation}

Over the past three seasons, Davis earned close to the league minimum in each season. In 2011 he received a slight increase up to $414,500, and he earned an additional raise for 2012, up to $506,690.\textsuperscript{16} As Davis has accumulated only 2.168 years of service, this is the first time he has been eligible for salary arbitration.

\textbf{VI. Comparative Baseball Salaries}

The Mets are relying Ike Davis to maintain his strong career statistics, but his platform season was not consistent enough to warrant such a substantial increase in compensation. Comparison to similar first basemen illustrates the needed production and consistency for the

\textsuperscript{14} Id.
\textsuperscript{15} http://mets360.com/?p=13206&utm_source=feedburner&utm_medium=feed&utm_campaign=Feed%3A+Mets360+%2Ffeed+%28Mets360+Feed%29
Mets to accommodate such a request. The following comparisons will illustrate Ike Davis’s true value, based on the performances and salaries of other similar players.

a. Garrett Jones ($2.25 million in 2012)

Comparing the performance of Mr. Davis to that of Pittsburgh first baseman Garrett Jones illustrates the value of Mr. Davis, which does not exceed the midpoint of $2.7 million. Jones entered into 2012 salary arbitration with a previous salary of $455,500, slightly below Mr. Davis, but they are fairly comparable in Major League Service. Jones lost in arbitration to the Pirates, increasing his salary to $2.25 million, well below the $2.7 million midpoint in the present case. Although platform year statistics appear to favor Mr. Davis in comparison, the two first basemen have posted nearly equal marks in their respective career averages. Because the value given to a strikingly similar performance by Mr. Jones is far below the midpoint of $2.7 million, the value assessed to Mr. Davis should also fall short.

| Table 1: Comparative Batting Statistics between Ike Davis and Garrett Jones |
|------------------|------------------|------------------|------------------|------------------|
|                  | PLATFORM         | CAREER (average) |
|                  | G    | PA   | R    | HR  | SO  | RBI | AVG | OPS |
| Davis            | 156  | 584  | 66   | 32  | 141 | 90  | .227 | .771 |
| Jones            | 148  | 478  | 51   | 16  | 104 | 58  | .247 | .753 |
|                  | 113  | 445  | 53   | 19  | 103 | 62  | .252 | .791 |
|                  | 129  | 497  | 53   | 19  | 101 | 63  | .257 | .782 |

Up to the time of their first arbitrations, Jones had played in slightly more games and leads Mr. Davis in Plate Appearances. Their production numbers, however, are almost identical through their young careers. The averages for Garrett Jones, seen in the chart above, include his

career from 2009 - 2011. Although he had a short stint in the Majors with the Minnesota Twins at the end of the 2007 season, Jones did not return to the Majors until mid-2009 with Pittsburgh. Through two-and-a-half seasons with the Pirates, his production at the plate almost mirrors what Mr. Davis has done in the same amount of time. This comparison demonstrates the value assessed by an arbitration panel ($2.25 million) to a player with comparable statistics to Mr. Davis – a value well below the midpoint of $2.7 million.

Like Mr. Davis’s 2012 campaign, Jones underperformed in his platform season of 2011. Comparatively, Mr. Davis did outperform Jones by the numbers in that particular season, but Mr. Davis also had 116 more plate appearances than Jones. Mr. Jones was used not only as a first baseman, but also to fill in gaps in the Pirates defensive lineup – playing approximately half the season in the outfield. The under-performance in Jones’s platform season statistics is yet another example of the diminished value placed on inconsistent batters who underperform regarding their average projections. This trend is indeed a contributing factor as to why Mr. Davis should not be valued too much higher than Mr. Jones’s $2.25 million award last year.

b. Daric Barton ($1.1 million in 2012)

Like Mr. Davis, Oakland first baseman Daric Barton has suffered season shortening injuries that have negatively affected his statistical performance. Understanding that the Mets do not believe the extent of Mr. Davis’s ankle injury rivals the injury-plagued career of Mr. Barton; the importance of a comparison to Barton is the effect of Barton’s post-recovery production in the Athletics’ lineup. Following a hamstring injury that sidelined Mr. Barton in 2009, he returned in 2010 and performed well above what his averages would project. Even though his

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2011 platform was subsequently shortened due to a torn labrum, Mr. Barton’s consistency when coming back from injury is evidence leading to a higher award for an injury-prone player.

<p>| TABLE 2: Season Following a Season-Ending Injury |</p>
<table>
<thead>
<tr>
<th>Year</th>
<th>G</th>
<th>PA</th>
<th>R</th>
<th>HR</th>
<th>SO</th>
<th>RBI</th>
<th>AVG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Davis</td>
<td>2012</td>
<td>156</td>
<td>584</td>
<td>66</td>
<td>32</td>
<td>141</td>
<td>90</td>
<td>.227</td>
</tr>
<tr>
<td>Career (average)</td>
<td>113</td>
<td>445</td>
<td>53</td>
<td>19</td>
<td>103</td>
<td>62</td>
<td>.252</td>
<td>.791</td>
</tr>
<tr>
<td>Barton</td>
<td>2010</td>
<td>159</td>
<td>686</td>
<td>79</td>
<td>10</td>
<td>102</td>
<td>57</td>
<td>.273</td>
</tr>
<tr>
<td>Career (average)</td>
<td>88</td>
<td>353</td>
<td>42</td>
<td>5</td>
<td>57</td>
<td>31</td>
<td>.252</td>
<td>.740</td>
</tr>
</tbody>
</table>

Had Mr. Davis performed consistently at or near his career averages in the season following his injury, his argument for an award nearer to the midpoint of $2.7 million would be stronger. Although the Mets value Mr. Davis much higher than the equivalent of Mr. Barton at $1.1 million, we must use Barton’s 2010 season as an example of the reward for consistency over a career, even when his platform season was cut short in 2011.19

c. James Loney ($3.1 million in 2010)

Looking at only the numbers, Mr. Davis seems to have equal footing with Los Angeles Dodger first baseman James Loney regarding each player’s platform year and career average statistics; and his argument would likely follow that he is entitled to the same compensation as Mr. Loney.

Table 3: Comparative Batting Statistics between Ike Davis and James Loney

<table>
<thead>
<tr>
<th>PLATFORM</th>
<th>CAREER (average)</th>
</tr>
</thead>
<tbody>
<tr>
<td>G</td>
<td>PA</td>
</tr>
<tr>
<td>Davis</td>
<td>156</td>
</tr>
<tr>
<td>Loney</td>
<td>158</td>
</tr>
</tbody>
</table>

However, one main issue separates Mr. Loney’s value of $3.1 million and Mr. Davis’s value well under the midpoint of $2.7 million: Mr. Loney has maintained a consistent statistical performance over four seasons prior to his value being assessed at $3.1 million. From 2006 – 2009, Mr. Loney never fell below .281 for a season AVG, neither has he struck out more than 85 times in any one season – nearly half the amount of strikeouts by Mr. Davis (141 in 2012). In the two full seasons played before he was arbitration eligible (2008 and 2009), Mr. Loney had 651 and 652 plate appearances, and hit for .289 and .281, respectively – also contributing 90 RBI per season. Furthermore, although Mr. Loney’s OPS dipped in his platform year, his ability to score Runs had steadily risen from 20, to 41, to 66, to 73 form 2006 – 2009.20

The Mets do not doubt that Mr. Davis will eventually be valued equal to or possibly greater than Mr. Loney’s 2010 compensation of $3.1 million; but before he can be awarded that amount, the Club needs to be able to count on the consistency that Mr. Loney has shown the Dodgers from 2006 – 2009.

VII. Recent Performance by the Club

When healthy, Davis has been the starting first baseman for the Mets in his 3 seasons in New York. Since his arrival, the Mets have yet to move from their 4th place finishes in the

National League Eastern Division. Over the past three seasons, the Mets’ record has steadily decreased from 79 wins in 2010, to 77 wins in 2011, and 74 wins this past season.

In his platform season, the Mets performed inversely to their first baseman’s production. The Club started the season 46 - 40, but posted a dismal 28 - 48 after the All-Star Break. Davis’s turnaround in June was no doubt a catalyst for the Mets. He hit .264 with an OPS of .926 for the month,21 while the Mets finished the month two games above .500 and 2.5 games behind Washington for the division lead. However as Davis began to produce, the Mets began to fall fast, only posting .328 winning percentage after the All-Star Break.

VIII. Conclusion

Through his two-plus years in the Major Leagues, Ike Davis has shown signs of greatness, and the Mets look forward to a bright future for their first baseman. However, the Club is still patiently waiting on him to overcome his inconsistency issues. Unfortunately, following his severe ankle injury he has failed to put together a complete season, performing at the level of his capabilities. Further, both Mr. Davis and the Mets are aware of the possibility of on-going complications stemming from the injury.

Based on the evidence provided in this brief and in oral argument, the New York Mets respectfully request that this panel find the Club’s offer of $2.4 million to be an appropriate salary for Ike Davis for the 2013 season.

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