2013 National Baseball Arbitration Competition

**Tommy Hanson v. Atlanta Braves**
Submission on Behalf of Tommy Hanson
Midpoint: $3.9 million
Submission by: Team 17
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I. INTRODUCTION AND REQUEST FOR HEARING DECISION

This brief analyzes the talents and contributions of right-handed pitcher Thomas J. Hanson (the “Player” or “Mr. Hanson”) to be reflected in his 2013 contract with the Atlanta Braves (the “Club” or the “Braves”). The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) governs this arbitration hearing.¹

Under the CBA, the following criteria will be considered in determining the Player’s award: (1) the quality of the 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 contribution; (3) the record of the Player’s past compensation; (4) comparative baseball salaries; (5) the existence of any physical or mental defects; and (6) the recent performance record of the Club, including but not limited to its League standing and attendance as an indication of public acceptance.² Mr. Hanson has reached 3.120 years of MLB service, entitling him to file for first-year arbitration.³

Mr. Hanson’s past accomplishments and contributions, and his demonstrated potential to be one of the top starting pitchers in baseball, establish that he is fairly entitled to a salary exceeding the $3.9 million midpoint between his final offer and the final offer of the Club. Mr. Hanson respectfully requests that the arbitration panel find that he is entitled to a 2013 salary arbitration award of $4.3 million.

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² Id.
II. Quality of the Player’s Contribution During the Past Season

In his platform season, Tommy Hanson continued to serve as a starting pitcher for the Atlanta Braves. The Braves’ opening day starter in 2012, Mr. Hanson started 31 games on the mound, winning a career-high 13 games on the way to a 13-10 record. Mr. Hanson struck out a remarkable 8.3 batters per nine innings, consistent with his career strikeout rate of 8.4. He posted an ERA of 4.48 in just under 175 innings of work.

<table>
<thead>
<tr>
<th>Table 1: Tommy Hanson (RHP) Platform Season</th>
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<tr>
<td>MLB Service: 3.120 years</td>
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<tr>
<td>DOB: August 28, 1986</td>
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<tr>
<td>GS  W  L  ERA  IP  BB  K  WHIP</td>
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<td>2012 31 13 10 4.48 174.2 71 161 1.454</td>
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Despite a stint on the 15-day disabled list due to a lower back strain (see Section V below), Mr. Hanson continued to contribute to the success of the Braves, who won 20 of the 31 games that he started. Mr. Hanson’s contributions during 2012 are indicative of his continued success, and his potential to be a front-of-the-rotation Major League pitcher going forward.

III. Length and Consistency of Career Contributions

Mr. Hanson was drafted by the Atlanta Braves in the twenty-second round of the 2005 amateur draft, and was signed by the Braves in 2006 as a draft-and-follow. As he worked his

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4 Id.
5 Id.
6 Id.
7 Id.
way through the minor leagues, Mr. Hanson’s extraordinary pitching ability was unmistakable. Mr. Hanson dominated the Appalachian League in 2006, posting a 2.09 ERA and a 0.99 WHIP for the Danville Braves. After spending the 2007 season in class-A, Mr. Hanson joined the double-A Mississippi Braves in 2008. Mr. Hanson’s dominant 2008 campaign – during which he threw the first no-hitter in Mississippi Braves history – earned him an invitation to pitch in the prestigious Arizona Fall League. Mr. Hanson then led the Arizona Fall League in wins (5), ERA (0.63) and strikeouts (49), on the way to becoming the first ever pitcher to be named the Fall League’s MVP.

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<th>Table 2: Tommy Hanson (RHP) Career</th>
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<tr>
<td>MLB Service: 3.120 years</td>
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<td>GS</td>
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<td>2009</td>
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<td>2010</td>
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<td>2011</td>
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<tr>
<td>2012</td>
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<tr>
<td>Career</td>
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Mr. Hanson continued his success into 2009, when he was called up to the majors to join the Braves’ starting rotation. He made his Atlanta Braves debut on June 7, and quickly established himself as one of the top young pitchers in the majors. As a 22-year old rookie, he went 11-4 with a 2.89 ERA, and finished third in National League Rookie of the Year voting.

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12 Id.
16 Id.
Mr. Hanson met continued success in 2010, posting a 3.33 ERA. He did not miss a start in 2010, pitching over 200 innings in 34 starts for the playoff-bound Braves. Though his 2011 campaign was somewhat tarnished by shoulder inflammation that sent him twice to the disabled list (see Section V below), Mr. Hanson persevered through the setbacks, posting a career high strikeout rate of 9.8, and a career-best WHIP of 1.169.

Over his career, Mr. Hanson has shown the ability to turn in strong performances both at home and on the road. He has a 3.55 ERA at home and a 3.68 ERA on the road. For his career, he is 22-15 at home, and 23-17 on the road. Given such consistent, balanced performance, it is unlikely that pitching half of his games at Turner Field has had a meaningful impact on his remarkable career accomplishments.

Mr. Hanson has contributed to the Braves’ success throughout his career, and has demonstrated his strong potential to be one of baseball’s most dominant pitchers. Despite minor injuries in 2011 and 2012, Mr. Hanson’s career numbers still compare favorably to those of the best young pitchers in the game. Mr. Hanson will be 26 years old as he enters the 2013 season, as he looks to build upon the strong performance and remarkable potential he has demonstrated thus far in his career.

17 Id.
18 Id.
19 Id.
21 Id.
23 For a statistical comparison to other first-year arbitration-eligible pitchers, see Section VI below.
IV. **Past Player Compensation**

Mr. Hanson has earned close to the MLB minimum salary to this point in his service, receiving $435,000 in 2010, $456,500 in 2011 and $535,000 in 2012. Mr. Hanson’s performance and demonstrated potential in more than three years of Major League service qualify him for a salary commensurate with his abilities and contributions.

V. **Existence of Physical or Mental Defects**

At 26 years of age, Mr. Hanson has proven to be a consistent, durable pitcher for most of his young career. Despite minor setbacks during the 2011 season, and again in 2012, he has continued to demonstrate physical and mental resiliency. Mr. Hanson has never required structural surgery, and is free of any structural defects that may threaten his continued success.

In 2011, Mr. Hanson battled shoulder inflammation, first in June, and again in August. He was placed on the 15-day disabled list on June 13, and returned to the Braves’ rotation on June 28. He returned to the disabled list on August 7, and did not return to action until his Opening Day start in 2012. Importantly, MRIs taken during the 2011 season revealed no structural damage to Mr. Hanson’s shoulder; both stints on the disabled list were due merely to inflammation. Despite these shoulder issues, Mr. Hanson contributed greatly to the Braves’

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28 See Tommy Hanson DL, supra.
2011 efforts. He rode an impressive 3.60 ERA to an 11-7 record. Further, he posted a career-best WHIP of 1.169, and an astounding career-high strikeout rate of 9.8 batters per nine innings. Mr. Hanson’s 2011 contributions demonstrate his mental toughness, and his ability to bounce back from injury.

In 2012, Mr. Hanson was placed on the 15-day disabled list on July 31, due to a strained lower back. He returned to the Braves’ rotation on August 17, 2012, and did not miss a start for the rest of the 2012 season.

VI. COMPARATIVE BASEBALL SALARIES

It is rare for a dominant starting pitcher like Mr. Hanson to go through an arbitration hearing (or even sign a one-year contract) as a first-year arbitration-eligible player. Some top pitchers mature much later in their careers, while others sign multi-year contract extensions once becoming arbitration-eligible. Given the dearth of pitchers of Mr. Hanson’s caliber who went through arbitration hearings as first-year eligible players, it will be instructive to consider one-year contracts of comparable pitchers with between three and four years of Major League

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30 Id.
Service Time. Mr. Hanson’s career accomplishments compare favorably to those of Matt Garza in 2011 and those of Chad Billingsley in 2010.

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<th>Table 3: Comparative Starting Pitchers</th>
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<tr>
<td>Tommy Hanson (RHP)</td>
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<td><strong>GS</strong></td>
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<tr>
<td>2012</td>
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<tr>
<td>Career</td>
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<tr>
<td>Matt Garza (RHP)</td>
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<tr>
<td><strong>GS</strong></td>
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<tr>
<td>2010</td>
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<tr>
<td>Career</td>
</tr>
<tr>
<td>Chad Billingsley (RHP)</td>
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<tr>
<td><strong>GS</strong></td>
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<tr>
<td>2009</td>
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<td>Career</td>
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Matt Garza’s $5.95 million contract in 2011 is well above Mr. Hanson’s offer of $4.3 million. Mr. Hanson’s career numbers, however, compare very favorably to those of Mr. Garza. Mr. Hanson has posted a better career ERA (3.61 to 3.97), a better record (45-32 to 42-44) and a higher strikeout rate (8.4 to 7.1), as compared to Mr. Garza’s performance. Taken as a whole, Mr. Hanson’s career résumé is stronger than the pre-2011 record of Mr. Garza. The discrepancy between our offer and the value of Mr. Garza’s contract can be justified by comparing Mr. Garza’s much-improved platform season to Mr. Hanson’s tepid 2012 campaign. While Mr. Hanson’s career accomplishments are at least equal to those of Mr. Garza, our offer of

33 The CBA encourages comparisons to “the contracts of Players with Major League service not exceeding one annual service group above the Player’s annual service group.” Major League Baseball Collective Bargaining Agreement, “2012-2016 Basic Agreement,” Article VI(E), § 10(a).
35 Id.
36 Mr. Garza posted a 3.91 ERA and a career-high 15 wins in 2010. Id.
$4.3 million reflects a fair salary for Mr. Hanson, given his platform-year decline and injury history.

Chad Billingsley’s $3.85 million contract in 2010, though slightly below our midpoint of $3.9 million, also provides a useful comparison. While we believe Mr. Hanson’s overall résumé is stronger than that of Mr. Billingsley, Mr. Billingsley’s early career trajectory provides a valuable comparison. Like Mr. Hanson, Mr. Billingsley entered first-year arbitration following a disappointing platform season that was tarnished by injuries. In 2009, Mr. Billingsley had an exceptional first half of the season – and was named a National League All-Star – before sliding into a severe second-half slump. After the All-Star break, he “twice encountered hamstring tightness”, in July and again in September. His numbers faltered, with a 5.20 ERA and 3-7 record after the break; the struggling Billingsley made only one postseason appearance for the NLCS-bound Dodgers. Entering first-year arbitration, his career statistical résumé had been strong – though not quite as strong as Mr. Hanson’s. Despite his injury issues and disappointing platform season, Mr. Billingsley was given a $3.85 million contract for 2010. While his 2010 contract does not perfectly anticipate the amount he would have received in arbitration, the figure is a relevant comparison. Mr. Hanson’s superior performance over his

39 Id.
41 Id.
42 Though Mr. Billingsley posted a slightly lower ERA (3.55 to 3.61), Mr. Hanson had a clearly superior WHIP (1.252 to 1.375) and slightly better strikeout and walk rates. See Chad Billingsley Statistics and History, Baseball-Reference.com, http://www.baseball-reference.com/players/b/billich01.shtml
career demonstrates that he is deserving of a salary greater than that received by Mr. Billingsley, and greater than the midpoint of $3.9 million.

VII. RECENT PERFORMANCE OF THE CLUB

In 2012, the Atlanta Braves posted a 94-68 record, finishing just four games behind the division-champion Nationals. Their regular season success earned the Braves a Wild Card berth in the playoffs, where they lost a single-elimination game to the Cardinals.43

The Braves rode their strong pitching staff to a success in 2012 campaign. In the 2012 season, the Braves allowed the fifth fewest runs in the majors (600 runs allowed), while their middling offense ranked 17th in the majors (700 runs scored). The pitching staff did their part, allowing an ERA of 3.42, good for fifth-best in the majors, while posting a WHIP of 1.23, which tied for third-best in the majors.44 As the Braves look to continue their dominant pitching into the 2013 season, Mr. Hanson’s pitching efforts will be a critical component if the Braves are to continue their recent success.

VIII. CONCLUSION

Mr. Hanson has the ability and potential to be one of the top starting pitchers in baseball, as evidenced by his contributions throughout his career. As he recovers from minor injuries, Mr. Hanson will continue to be a key contributor to the Braves’ efforts in 2013. Based on the

43 MLB Standings, MLB.com, http://mlb.mlb.com/mlb/standings/#20121003
44 MLB Stats, MLB.com, http://mlb.mlb.com/stats/sortable.jsp?c_id=mlb&tcid=mm_mlb_stats#elem=[object+Object]&tab_level=child&click_text=Sortable+Team+pitching&sectionType=st&statType=pitching&page=1&ts=1356999757059&sortColumn=whip&sortOrder=%27asc%27&extended=0
evidence outlined in this brief, and presented in oral argument, we respectfully request a finding
that Mr. Hanson is entitled to a $4.3 million contract for the 2013 season.