Ike Davis v. New York Mets

Submission on Behalf of the New York Mets

Team 18
I. Introduction

Mr. Issac “Ike” Benjamin Davis ("Mr. Davis") is a 6’4”, 230lb. left-handed first basemen for the New York Mets (the “Mets”). Mr. Davis made his Major League Baseball (“MLB”) debut in 2010 and has 2.168 years of MLB service time.1 Pursuant to Article VI, Section E, Part 10 (a) & (b) of the current MLB Collective Bargaining Agreement (“CBA”), this makes Mr. Davis eligible to submit a single salary figure to an arbitration panel as “super two” status.2 Mr. Davis and the Mets were unable to reach an agreement over Mr. Davis’ salary for the 2013 Major League Baseball Season. Therefore, Mr. Davis, submitted a single salary figure for the 2013 season of three million dollars ($3,000,000) and submits this Brief in support thereof. In opposition, the Mets submitted a single salary figure for the 2013 season of two million, four hundred thousand dollars ($2,400,000). The Mets request this Arbitration Panel enter judgment against Mr. Davis and in their favor for the reasons provided in the following sections.

II. Weakness of Mr. Davis’ Contribution to Mets During the 2012 Season

Last season, Mr. Davis started the year pathetic by hitting a .158 avg., a .234 OBP., and a .273 slg.3 Mr. Davis did not start to hit until August, when the Mets were already 12 games out of first place and Johan Santana, arguably the Mets best pitcher, was on the disabled list and did not play another game. Mr. Davis had a strong month however, the Mets deficit continued to get larger and increased to 17.5 games on September 1. As shown more thoroughly below, Mr. Davis finished the season with Mr. Davis had a .227 batting average, a .308 OBP, a -0.9 WAA, a

A more thorough analysis of Mr. Davis’ season statistics are shown in section III.

III. Length and Contributions of Mr. Davis’ Career

The Mets as the 18th overall pick in the 2008 amateur draft drafted Mr. Davis. After getting drafted, Mr. Davis was assigned to the short-A affiliate of the Mets, the Brooklyn Cyclones. At the start of the 2009 season, Mr. Davis started the year with the high-A affiliate, the St. Lucie Mets. Within the same season, Mr. Davis was promoted to the AA affiliate, the Binghamton Mets. To start the 2010 season, Mr. Davis played for the Mets AAA affiliate, the Buffalo Bisons. Mr. Davis made his debut for the Mets on April 19, 2010. Mr. Davis finished the season with: 523 at-bats, a .264 BA, 73 runs, a .351 on base percentage, and 19 home runs; defensive statistics such as: a 12 Rfield and a dWAR of 0.3. However, according to the sabermetrics, Mr. Davis also finished with a dWAR of 0.3 and WAA of 1.5. This means that despite what many believed was a fantastic year because Mr. Davis had a .351 OBP and 19 home runs, was really only an average year when looked at his marginal skill. However, the fans were high on him due to his potential; but guess what; potential does not get you paid unless it is realized.

Mr. Davis made the Mets opening day roster to start the 2011 season. Despite his decent start to the season, on May 10, 2011, Mr. Davis collided with David Wright, the Mets third

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4 *Infra*, note 5. Rfield is a statistic that shows how good the player is at fielding as compared to a replacement player. *Id.* WAA is how many wins the player generates over that of an average player. *Id.* WAR is how many wins the player generates over that of a replacement player. *Id.*

5 [BASEBALL-REFERENCE.COM](http://www.baseball-reference.com/players/d/davisik02.shtml#contracts) (last visited Jan. 5, 2013). Rfield is a statistic which shows the number of runs, better or worse, that the average player is for all fielding statistics. *Id.* This shows that Mr. Davis was 12 points better field than the average first basemen was at fielding.

6 *Id.*

7 *Supra*, note 5.
basement, injuring his ankle, which Mr. Davis to miss all but 36 games.\textsuperscript{8} This surgery caused Mr. Davis to miss most of the 2011 season; Mr. Davis finished the season with only 129 at bats, not an accurate statistical sample of his abilities.\textsuperscript{9}

2012 was supposed to be a breakout season for Mr. Davis. For the 2012 major league season, Mr. Davis batted in the fourth spot or “clean-up.” In the clean-up spot, a player is supposed to be a power hitter who hits in runs in crucial situations. Despite popular belief, Mr. Davis only had an average season. Popular belief may tell you that his power numbers showed you Mr. Davis had an excellent season and only his team let him down as shown by his 32 home runs and 90 RBI’s. However, when looking at his numbers separate from those two figures, it really shows Mr. Davis may have hurt the Mets more than he helped them. Mr. Davis had a .227 batting average, a .308 OBP, a -0.9 WAA, a -3 Rfield, and a WAR value of 0.7.\textsuperscript{10} Not only do these statistics have great value on the determination of Mr. Davis’ salary, Mr. Davis struck out 141 times, while only walking 61 times. What does this mean; Mr. Davis would get up to bat and would either strike out or hit a home run. When Mr. Davis got a hit, 27.1\% of the time it was a home run. However, this an over inflated statistic. Mr. Davis only hit .227 so in reality, Mr. Davis only hit a home run on 6.16\% of at bats and struck out on 27.2\% of his at bats. These statistics also reveal that Mr. Davis struck out more than he got a hit.

The most important stat of all is Mr. Davis’ WAA (his Wins Above an Average player). Mr. Davis had a -0.9 WAA. That meant that if an average player were to be substituted for Mr. Davis, the Mets would win more games. Mr. Davis wants three million dollars to lose games for the Mets, and the Mets do not see this as a fair value to be charged for Mr. Davis’ services.

\textsuperscript{9} Id.
\textsuperscript{10} Supra, note 5.
Finally, we must look at Mr. Davis’ split statistics. Against left handed pitchers, Mr. Davis had a .174 batting average with a .225 on base percentage. If there is a left handed pitcher on the mound that evening, Mr. Davis has almost no value to the Mets. Mr. Davis does not even get on base 25% of the time when facing leftys, and in fact he struck out 28.1%, more than getting on base. Also, with runners in scoring position (a player on second and/or third base) Mr. Davis had a .214 batting average and a .289 on base percentage; not to mention, 27% of the time when there are runners in scoring position, Mr. Davis struck out; that means he doesn’t even put the ball in play to give the Mets a chance to score a run.\textsuperscript{11}

Going back to Mr. Davis’ strike outs, their value cannot be overemphasized. When a player strikes out, that means he does not put the ball into play. When you do not put the ball into play, you do not work counts, you do not work pitchers, and you allow starting pitchers to go deep into games without working their pitch counts. When this happens, the opposing team can become more situational later in the game. This will mean that if there is a crucial part of a game and Mr. Davis is up to bat, the opposing team could bring in a left handed pitcher to face Mr. Davis and very likely, Mr. Davis will not get a hit and more than likely will strike out.

\textbf{IV. Record of Mr. Davis’ Past Compensation}

From 2010–2012, Mr. Davis has earned $938,690 cumulatively. Mr. Davis earned $432,000 in 2011 and $506,690 in 2012.\textsuperscript{12} However, this year the Mets are willing to recognize Mr. Davis’ increased worth and have presented an acceptable offer to Mr. Davis regarding his 2012 salary.

\textsuperscript{12} Supra, note 5.
V. Comparative Baseball Salaries

Many first basemen in the league have much better statistics as compared to Mr. Davis in key statistical categories of batting average, hits, and RBI, but are still being paid much less than Mr. Davis is asking for despite their superior offensive production. The three first basemen are Garrett Jones, Dan Johnson, and Kendry Morales.

1. Garrett Jones v. Ike Davis

Garrett Jones (“Jones”) is similarly 6’4”, 230 lbs., and is also a switch hitting first and third baseman that played the last four seasons with the Pittsburgh Pirates. Jones, like Mr. Davis, at time of his arbitration had no awards. Also, like Mr. Davis, Jones had super 2 status at the time of his arbitration.

Jones was eligible for arbitration at the end of the 2011 season, where he lost in arbitration to the team and was awarded a 1 year, $2.325 million contract with the Pirates. The attached Exhibit A demonstrates that over the past six seasons, Jones and Mr. Davis have very comparable statistics. However, Jones exceeds Mr. Davis in many key categories, and is therefore not deserving of the $3 million award, sought by Mr. Davis and closer to Jones’ contract of $2.25 million.

Jones has averaged a .261 batting average, 20 home runs, and 63 RBI over the last four seasons. In comparison, Mr. Davis has averaged a .246 batting average, 25 home runs, and 80 RBI over the course of the two full seasons he played. Unlike Mr. Davis, Jones has not missed a considerable portion of the any season with an injury. Jones also can play multiple positions and

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does, on the regular, play a lot of outfield. Now although some may consider Jones to be more of an outfielder than a first baseman, he plays a considerable amount of time to be considered a first basemen and therefore a valid comparable.

Jones and Mr. Davis have very similar WAR statistics, where Jones has a 8 oRAR, Mr. Davis had a 10. Where Mr. Davis had a 0.7 WAR, Jones had a 0.1. Lastly, where Mr. Davis had a -0.9 for WAA, Jones had a -1.2. So both players are almost exactly alike, except for the key statistics as mentioned below.

Jones and Mr. Davis have very similar statistics except Mr. Davis has a much higher amount of strike outs; Jones averaged around 100 per season, whereas Mr. Davis is around 140 strike outs per year. Jones and Mr. Davis have around the same number for their on base percentage, slugging percentage, and obviously OPS. Just like Mr. Davis, Jones struggles against left handed pitching and is much better against right handed pitching. Also, like Mr. Davis, Jones struggles when the Pirates lose, and is very strong when the Pirates win. However, what may be the biggest difference is when there are runners in scoring position. As mentioned above, Mr. Davis had a batting average of .214 with runners in scoring position with 43 strike outs. Compared to Jones who had a .274 batting average, an on base percentage of .411 and struck out only 22 times. When it mattered most to the Pirates, with runners who can score, Jones came up big, whereas Mr. Davis would more likely than almost any other scenario struck out.

This is an injustice that should be addressed by the arbitration panel, and Mr. Davis should be paid the comparable salary of Jones in the amount requested by the Mets of $2.4 million.
2. Dan Johnson v. Ike Davis

Dan Johnson (“Johnson”) is a little smaller than Mr. Davis at 6’2” and 210 lbs., and is a right-handed first baseman for the Tampa Bay Rays. Johnson made his MLB debut in 2005 for the Oakland Athletics. Johnson has no awards or all-star appearances in his time as a major leaguer. Johnson was eligible for arbitration last season, but signed a 1 year, $1.1 million contract and avoided going to arbitration.

Johnson and Mr. Davis have very similar stats when compared over the last three seasons. Johnson had an up and down career, starting off playing a lot and then being sent down to the minor leagues often. However, his most prevalent full season was in 2007, where Johnson had 495 at-bats. During this season, Johnson had a .236 batting average, an OPS of .768, 18 home runs, and 62 RBI’s. Johnson also had an Rfield of 0, an oRAR of 16, a WAR of 1.5 and a WAA of 0. According to the statistics of this season, Johnson and Mr. Davis had comparable statistics. Although, Mr. Davis may have had more home runs and RBI’s, Johnson had a little better batting average, struck out half the time, and had 40 points more on his on base percentage.

Johnson, during his platform year only had 111 At-bats, and still had a very similar statistical year. Similarly, Johnson had similar OPS as Mr. Davis and similar saber metrics. Johnson had a -3 Rfield, like that of Mr. Davis, a WAR of 0.1, similar to the 0.7 of Mr. Davis, and a WAA of -0.3. Now although Mr. Davis did contribute to the losses of the A’s, Mr. Davis’ WAA was more than twice as bad as that of Johnson.

Not only that, but in 2010, the Tampa Bay Rays won the AL East, one of the hardest divisions in baseball, and were the top seed in the playoffs. Now obviously, Dan Johnson was
not a major factor, however, he was a player on this team when they won and therefore, was awarded according.

However, the most telling part of this equation of all is that the Tampa Bay Rays only awarded Johnson $1 million. Mr. Davis is asking for $3 million. It does not seem fair or proper to give Mr. Davis triple the amount of money Johnson received when he did not have triple the statistics. Johnson had very similar statistics, got on base, hit around the same, and had the same margins as Mr. Davis. Surely, Mr. Davis deserves more money than Johnson received; however as shown above, he deserves $2.4 million.

3. Kendry Morales v. Ike Davis

The final Player who is making more than Mr. Davis is asking for but with much more value is Kendry Morales (“Morales”). Morales is smaller than Mr. Davis at 6’1” and 225 lbs. He is a right-handed first baseman who has also is a switch-hitter for the Los Angeles Angels of Anaheim. Compared Mr. Davis, Morales made his MLB debut early in 2006, but like Mr. Davis, Morales has not accumulated any awards, All-Star appearances, or postseason accolades. However, Morales, in 2009 was in the running for the Most Valuable Player award. Morales was eligible for arbitration in 2011, but accepted a 1-year, $2.975 million from the Los Angeles Angels of Anaheim. Like Mr. Davis, Morales missed most of the 2010 season due to a leg injury and missed the 2011 season, as well due to injury.

Unlike Mr. Davis, Morales has been valuable to his team as an offensive weapon, and has stayed healthy. In 2009, Morales had a .306 batting average, 34 home runs, 108 RBI’s, and an OPS of .924. For all intent and purposes, Morales had a one of the best statistical years that season. Morales helped propel the Angels to the AL West Division championship. Morales’ saber metrics were also extraordinary. Morales had an oRAR of 33, a WAR of 4.0, an Rfield of
8, and a WAA of 2.1. Unlike Davis, Morales added 2.1 wins above the average player. Unlike Mr. Davis, Morales was a threat whenever he was up at bat; Morales could get a hit as compared to just striking out or hitting a home run.

Not only is Morales a much better fielder as shown by his Rfield statistic, Morales, contributed to a division championship because his WAA is a positive and therefore adds to the teams win totals. However, Mr. Davis has hurt the team as compared to an average player.

Morales made the most after this year and earned $2.975 million and avoided arbitration. Mr. Davis is asking for $3 million. That is more, albeit a little more, money than what Morales earned. That does not seem just and therefore, Mr. Davis should not be awarded the $3 million. Morales is one of the biggest threats in Major League Baseball and therefore his arbitration is seen as such. However, there is no way; based on Morales and Mr. Davis’ statistics does Mr. Davis deserve to earn more money as compared to Morales. Mr. Davis’ offer should be rejected and therefore, the Mets should win and Mr. Davis should be awarded $2.4 million.

VI. Physical or Mental Defects on the Part of the Player

Mr. Davis has had injuries, which have kept him from playing. During the 2011 season, Mr. Davis injured his ankle allowing him to only play in 36 games. Mr. Davis is fully recovered, however, he is 29 years old and getting older and the Mets continue to hope Mr. Davis’ ankle is going to hold up over the course of another 162 Major League season.

VII. Recent Performance Record of the Club

Clearly, over the time, Mr. Davis has been a part of the Mets, the Mets have not enjoyed much success. In each of the past three seasons, the Mets have not won more than 79 games and
have not been better than fourth in their division over that time. The team has not been above 500 the past three seasons, and the Mets have never been close to winning the NL East division title over the last three years.

VIII. Conclusion

For the foregoing reasons, the Mets respectfully request this panel to find against Mr. Davis and in its favor, and award Mr. Davis with a salary figure of $2,400,000 for the 2013 season.

Exhibit A

Garrett Jones 1B/OF
Pirates

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CAREER BATTING STATISTICS

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