Ike Davis v. New York Mets
Submission on Behalf of Ike Davis
Midpoint: $2.7 million
Submission by: Team 22
Table of Contents

I. Introduction and Request for Hearing Decision......................................................3
II. Quality of Ike Davis’ Contribution During the Past Season............................................4
III. Length and Consistency of Career Contributions......................................................6
IV. Past Player Compensation......................................................................................7
V. Comparative Baseball Salaries..................................................................................8
VI. Existence of Physical or Mental Defects.................................................................11
VII. Recent Performance of the Club.............................................................................12
VIII. Conclusion.............................................................................................................12

Table of Authorities


Major League Baseball Collective Bargaining Agreement, “2007-2011 Basic Agreement”, Article VI

Major League Baseball Collective Bargaining Agreement, “2012-2016 Basic Agreement”, Article VI


I. Introduction and Request for Hearing Decision

On behalf of Ike Davis, this brief will highlight the qualities and contributions of left-handed, power-hitting, first baseman Ike Davis (“Mr. Davis”) to be reflected in his 2013 salary with the New York Mets (“Club” or “Mets”). The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) between the MLB Player’s Association and all MLB Clubs provides the guidelines for this arbitration proceeding.\(^1\) Article VI, Section E, Part 10 of the CBA enumerates the following criteria allowed for consideration during arbitration: (1) the quality of the Player’s contribution to his Club during the past season; (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 on the part of the Player; 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.\(^2\) Further, when considering comparative salaries, the CBA directs the panel to pay particular attention to the contracts of Players with Major League service time not exceeding one annual service group above the Player’s annual service group.\(^3\) Additionally, the following items shall be deemed inadmissible: (1) the financial position of the Player and the Club; (2) press comments, testimonials or similar material bearing on the performance of either the Player or the Club, except that recognized annual Player awards for playing excellence shall not be excluded; (3) offers made by either the Player or the Club prior to arbitration; (4) the cost to the parties of their representatives, attorneys, etc.; and (5) salaries in other sports or occupations.\(^4\)

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\(^2\) Id.

\(^3\) Id.

\(^4\) Id.
Mr. Davis has obtained the necessary Major League Service Time ("MLST") under the CBA to gain arbitration eligibility as a “Super Two.” The CBA dictates, “a Player with at least two but less than three years of Major League service shall be eligible for salary arbitration if: (a) he has accumulated at least 86 days of service during the immediately preceding season; and (b) he ranks in the top 22% (rounded to the nearest whole number) in total service in the class of Players who have at least two but less than three years of Major League service, however accumulated, but with at least 86 days of service accumulated during the immediately preceding season. If two or more Players are tied at 22%, all such Players shall be eligible.” Mr. Davis, at 2.168 years of MLST has met these requirements.

While Mr. Davis considers it a privilege to play Major League Baseball with the New York Mets, he also believes the Club’s salary offer undervalues his contributions to the organization. Though Mr. Davis suffered an ankle injury in 2011 that forced him to miss the latter part of the season, he has since rebounded beautifully, again providing the Mets with a productive, powerful bat in their lineup. Through this brief and oral argument, the Club will show that Mr. Davis’ performance rightfully warrants our proposed salary of $3 million for 2013, as his value clearly supersedes the $2.7 million midpoint between the parties’ offers. Mr. Davis respectfully requests this arbitration panel award a 2013 salary of $3 million.

II. Quality of Ike Davis’ Contributions During the Past Season

Mr. Davis rebounded from injury to serve the Mets as their starting first baseman and cleanup hitter in 2012, playing in 158 games with 584 Plate Appearances for the Mets. Though he started slowly, Mr. Davis quickly regained his form and finished the season with a Batting

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5 Id. at p. 18
7 Id.
Average of .227, an On Base Percentage of .308, a Slugging Percentage of .462 and an On-base Plus Slugging Percentage of .771.\(^9\)

“Batting Average” (“BA”) is a player’s average number of Hits per “At Bat” (“AB”), whereas “On Base Percentage” (“OBP”) represents the frequency with which a player gets on base per “Plate Appearance” (“PA”).\(^10\) PAs account for every instance in which a player comes to the plate as a hitter, while ABs are more limited excluding PAs resulting in Walks, Hit By Pitch, Sacrifices and Catcher Interference.\(^11\) Slugging Percentage (“SLG”) provides the rate of total bases a player receives per AB, with base values ranging from 1 for a single, to 4 for a Home Run.\(^12\) The sum of “On [Base] Plus Slugging” Percentage, or “OPS”, is a statistic has recently gained prominence as an improved method of evaluating overall offensive “production”, because it accommodates variations in hitting styles (e.g. power versus average).\(^13\)

<table>
<thead>
<tr>
<th>PA</th>
<th>R</th>
<th>HR</th>
<th>RBI</th>
<th>BA</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>584</td>
<td>66</td>
<td>32</td>
<td>90</td>
<td>0.227</td>
<td>0.308</td>
<td>0.462</td>
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<th>BA</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Half</td>
<td>295</td>
<td>30</td>
<td>12</td>
<td>49</td>
<td>0.201</td>
<td>0.271</td>
<td>0.388</td>
</tr>
<tr>
<td>2nd Half</td>
<td>289</td>
<td>36</td>
<td>20</td>
<td>41</td>
<td>0.255</td>
<td>0.346</td>
<td>0.542</td>
</tr>
</tbody>
</table>

The primary role of a cleanup hitter is to hit for power, meaning producing hits that advance runners multiple bases and create runs. Mr. Davis performed that role exceptionally. He led all Mets with 32 Home Runs (“HR”), the 5\(^{th}\) best total in the NL.\(^16\) Mr. Davis also produced 90 “Runs Batted In” (“RBI”) and scored 66 Runs, finishing second only to superstar teammate

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\(^9\) Id.  
\(^11\) Id.  
\(^12\) Id.  
\(^15\) Id, at [http://www.baseball-reference.com/players/split.cgi?id=davisik02&year=2012&t=b](http://www.baseball-reference.com/players/split.cgi?id=davisik02&year=2012&t=b)  
David Wright in each category. Mr. Davis’ platform year also boasted highlights of a 9 game hitting streak in which he had a BA of .462 with his 1st career Grand Slam, becoming the 9th Met to hit 3 Home Runs in a single game, and a perfect game, batting 4 for 4. In 2012, Mr. Davis again provided the Mets with the power and runs that the Club needs and expects from him, posting career-highs in some areas, further justifying his $3 million salary offer.

III. Length and Consistency of Career Contributions

Mr. Davis has shown the Mets great promise for the future in his first three years in Major League Baseball. Mr. Davis was selected as the Mets top pick in the first round of the 2008 amateur draft, and made his Major League less than two years on April 19th, 2010.

Mr. Davis immediately emerged as a fan favorite in his first season with the Mets, evidence of which could readily be seen throughout Citi Field in the form of the slogan “I LIKE IKE”. Mr. Davis had an exceptional rookie season, making 601 PAs, with which he produced 138 Hits, scored 73 Runs, and producing 71 RBIs. For the season, Mr. Davis was amongst the most productive Mets, ranking 2nd in HRs and RBIs, and 4th in Runs, while also ranking highly offensively amongst all NL rookies, garnering him votes for NL rookie-of-the-year.

Mr. Davis began the 2011 season as he ended 2010, by continuing to improve and excel. In the season’s first 36 games, Mr. Davis hit 7 HRs, and produced 25 RBIs. On May 11th, however, Mr. Davis suffered a left ankle sprain, along with torn cartilage and a bone bruise to his tibia, which ended his season. Despite missing 126 games, Mr. Davis produced a solid BA

19 Id.
22 Id.
23 Id.

6 of 12
(.302), OBP (.383), SLG (.543) and OPS (.925), still managing to rank 5th on the team in HRs and 8th in RBIs.²⁵

Mr. Davis returned to the starting lineup fully healthy in 2012, and produced just as he had before, hitting with power and producing runs for the Mets, thus quelling any doubts that he would not return to form after the ankle injury.

<table>
<thead>
<tr>
<th></th>
<th>PA</th>
<th>R</th>
<th>HR</th>
<th>RBI</th>
<th>BA</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>601</td>
<td>73</td>
<td>19</td>
<td>71</td>
<td>0.264</td>
<td>0.351</td>
<td>0.440</td>
<td>0.791</td>
</tr>
<tr>
<td>2011</td>
<td>149</td>
<td>20</td>
<td>7</td>
<td>25</td>
<td>0.302</td>
<td>0.383</td>
<td>0.543</td>
<td>0.925</td>
</tr>
<tr>
<td>2012</td>
<td>584</td>
<td>66</td>
<td>32</td>
<td>90</td>
<td>0.227</td>
<td>0.308</td>
<td>0.462</td>
<td>0.771</td>
</tr>
<tr>
<td>Career</td>
<td>1334</td>
<td>295</td>
<td>58</td>
<td>186</td>
<td>0.252</td>
<td>0.336</td>
<td>0.461</td>
<td>0.797</td>
</tr>
</tbody>
</table>

Mr. Davis’ career statistics and attributes are exceptional, especially for a young player, and the progression from year to year shows marked improvement despite the interruption due to his injury. Consistently providing a powerful bat and producing runs, Mr. Davis has even managed to retain the support of the demanding New York fan base. Mr. Davis’s consistently stellar performance and leadership as a young player gives the Club a foundation around which to develop talent in the coming years, further supporting the reasonableness of his proposed $3 million salary for 2013.

IV. Past Compensation

Mr. Davis has been compensated around league minimum by the Mets until reaching this arbitration eligibility.²⁷ Mr. Davis also received a $1.65 million signing bonus in 2008 that was warranted given his 1st round draft status.²⁸ Mr. Davis now seeks and deserves a raise

²⁶ Id.
²⁸ Id.
commensurate with his value to the Club. In light of Mr. Davis’s contribution leading up to this arbitration, a raise from his previous salary to $3 million for 2013 is appropriate.

V. Comparative Baseball Salaries

Mr. Davis has found a number of statistically comparable players whose compensation after their first year of arbitration eligibility, illustrates that Mr. Davis’s value exceeds the $2.7 million midpoint, and is consistent with his $3 million offer. Super Two eligibility presents unique problems for both the Club, who has less time to evaluate the long-term reliability of the player. Additionally, the player has less time to progress and to bolster their career statistics than standard eligibility players that the Club will likely compare them to during arbitration.

The first comparable player Mr. Davis would like this panel to focus on is James Loney, who received a one year, $3.1 million contract in 2010.29 Like Mr. Davis, Loney is a pure first baseman, who was the Los Angeles Dodgers’ top pick in the first round of the 2002 amateur draft.30 In his 2009 platform season, Loney had 68 more PAs, but managed to produce only 7 more Runs than Mr. Davis.31 Despite having fewer opportunities, Mr. Davis hit 19 more HRs than Loney and each compiled the 90 RBIs.32 Loney’s platform BA was admittedly higher than Mr. Davis’s (.281 vs. .227), as was his OBP (.357 vs. .308).33 Conversely, Mr. Davis produced a platform SLG of .462 besting Loney’s .339.34

Unlike Mr. Davis, Loney had no injuries prior to arbitration eligibility, so he produced 2 full seasons of consistent, quality offensive statistics to use as a barometer for his value.35 Mr.

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32 Id.
33 Id.
34 Id.
35 Id.
Davis has made the most of his limited MLST, however, surpassing Loney’s then career numbers by 95 Runs and 13 HRs.\textsuperscript{36}

Loney received his $3.1 million salary in 2010, so inflation must be accounted for when using the figure for comparison. If adjusted for inflation at the heightened rate applicable MLB player salaries, Loney’s $3.1 million valuation would be notably higher.\textsuperscript{37} Therefore, even with the time lost to injury, Mr. Davis’s higher career output as a run producer and highly comparable platform statistics tend to indicate that his value approaches Loney’s in many ways, placing his value well above the $2.7 million midpoint.

The next comparable is Kendrys Morales, who received a salary of $2.975 million for 2011. Morales, who fractured his tibia in a freak accident midway through his 2010 platform season, is a first baseman that occasionally plays right field.\textsuperscript{38} Because of Morales’ injury, Mr. Davis had significantly more PAs, resulting in an additional 21 HRs, 37 Runs, and 51 RBIs as compared to Morales.\textsuperscript{39} Mr. Morales produced a higher BA, OBP, SLG and OPS, but limited PAs have the capacity skew the offensive production statistics.\textsuperscript{40} Without a full platform year to evaluate Morales, the Club must have used his breakout season in 2009 to project his future value. In 2009, his offensive output was exceptional, garnering him votes for AL MVP. However, in 2009, Morales’ only complete MLB season, he only provided 2 more HRs than Mr. Davis did in 2012.\textsuperscript{41} As a byproduct of Morales’ injury and sparse performance record prior to 2009, Mr. Davis’s career offensive contributions are more significant, including more career PAs

\begin{footnotesize}
\begin{itemize}
\item [36] Id.
\item [38] Kendrys Morales, Baseball Prospectus, http://www.baseballprospectus.com/card/card.php?id=45379
\item [40] Id.
\item [41] Id.
\end{itemize}
\end{footnotesize}
and 140 more Runs. Though their career HR and RBI numbers are separated by single digits, Morales spent parts of 2 additional seasons in MLB, inflating his career totals.

One stark difference between the two lies in the availability of assessing their respective values post-injury, but prior to arbitration. Morales’ injury occurred in his platform year and required surgery after his salary deal was completed, and yet the team chose to compensate him at $2.975 million without any evidence of how he would perform afterward.\(^{42}\) Mr. Davis, who now stands a full, highly-productive season removed from his injury, which is proof of value that Morales’ could not present. Even in Morales’s single exceptional season, Mr. Davis’s power numbers and run production remain comparable. Additionally, and the added certainty of Mr. Davis’ ability to continue contributing at a high level adds value when compared to Morales, further adding credence to the reasonableness of his $3 million offer.

The final comparable player is Casey McGehee. McGehee who plays first, second and third base received a one year, $2.5375 million contract for 2012.\(^{43}\) McGehee’s lower salary can be attributed to his offensive productivity compared to players of Mr. Davis’s quality. With 16 more PAs than Mr. Davis in their respective platform seasons, McGehee produced inferior statistics in nearly every offensive category.\(^{44}\) Mr. Davis out-produced McGehee with an additional 20 Runs, 21 HRs, and 23 more RBIs, while also outperforming him in BA (.227 vs. .223), and incomparably superior OBP, SLG, and OPS numbers.\(^{45}\) Even without a major injury, McGehee has produced fewer Runs and HRs in more career PAs, while maintaining a lower


\(^{45}\) Id.
career OBP, SLG, and OPS.\textsuperscript{46} Mr. Davis has exhibited overwhelmingly superior skills to McGehee, which translates to value far exceeding McGehee and the $2.7 million midpoint.

### Table 4: Comparable Players

<table>
<thead>
<tr>
<th>Player</th>
<th>Offers: $3.0M (Player) – [2.7M] - $2.4M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ike Davis (1B)\textsuperscript{47}</td>
<td>PA R HR RBI BA OBP SLG OPS</td>
</tr>
<tr>
<td>2012</td>
<td>584 66 32 90 0.227 0.308 0.462 0.771</td>
</tr>
<tr>
<td>Career</td>
<td>1334 295 58 186 0.252 0.336 0.461 0.797</td>
</tr>
<tr>
<td>James Loney (1B)\textsuperscript{48}</td>
<td>Awarded 2010 Salary: $3,100,000</td>
</tr>
<tr>
<td>PA R HR RBI BA OBP SLG OPS</td>
<td>652 73 13 90 0.281 0.357 0.339 0.756</td>
</tr>
<tr>
<td>Career</td>
<td>1789 200 45 265 0.295 0.354 0.451 0.806</td>
</tr>
<tr>
<td>Kendrys Morales (1B/RF)\textsuperscript{49}</td>
<td>Awarded 2011 Salary: $2,975,000</td>
</tr>
<tr>
<td>PA R HR RBI BA OBP SLG OPS</td>
<td>211 29 11 39 0.290 0.346 0.569 0.924</td>
</tr>
<tr>
<td>Career</td>
<td>1240 155 57 192 0.284 0.336 0.502 0.838</td>
</tr>
<tr>
<td>Casey McGehee (1B/2B/3B)\textsuperscript{50}</td>
<td>Awarded 2012 Salary: $2,537,500</td>
</tr>
<tr>
<td>PA R HR RBI BA OBP SLG OPS</td>
<td>600 46 13 67 0.223 0.280 0.346 0.626</td>
</tr>
<tr>
<td>Career</td>
<td>1689 175 52 242 0.265 0.320 0.426 0.746</td>
</tr>
</tbody>
</table>

More like Loney than McGehee, Mr. Davis should be compensated with an amount consistent with his consistently high-level performance and visibility, regardless of his limited MLST. As the Mets power hitter and run producer, he continues to be one of the team’s, and also the NL’s best. A fair assessment of these player comparisons fully justifies Mr. Davis’ salary offer of $3 million.

**VI. Existence of Physical or Mental Defect**

Mr. Davis’s 2011 injury was a concern prior to this season, but his recent performance has all but eliminated any lingering doubts about his current capacity. After suffering an ankle sprain that resulted in some torn cartilage and a bone bruise in May, Mr. Davis was placed on the 60-

\textsuperscript{46} Id.  
\textsuperscript{49} Morales, Baseball Reference, http://www.baseball-reference.com/players/m/moralske01.shtml  
\textsuperscript{50} McGehee, Baseball Reference, http://www.baseball-reference.com/players/m/mcgehca01.shtml
Day “Disabled List” (“DL”), where he remained for the rest of the season.\(^{51}\) Other than a freak bout of valley fever in the beginning of 2012, Mr. Davis had no other injury issues.\(^{52}\) Mr. Davis is completely healthy and no longer presents an injury concern for his Club.

VII. Recent Performance of the Club

The Mets have struggled recently, finishing second to last in the NL East in 2012.\(^{53}\) Offensively, the team ranked 25\(^{th}\) in Runs (650) and 23\(^{rd}\) in SLG (.386).\(^{54}\) Mr. Davis has been one of very few bright spots in an otherwise abysmal offensive season. The consistently high quality of Mr. Davis production for the Mets increases his value and supports a $3 million salary.

VIII. Conclusion

In summation, Mr. Davis is one of few stars currently playing for the New York Mets in a city that loves its athletes. He has shown constant growth, and has never ceased to provide the Club with substantial run production and power numbers. Furthermore, Mr. Davis continued to do so after recovering from an early career injury, and produced many of his best statistics to date. That type of determination and consistency is exceedingly valuable. Along with his continued performance despite the team’s shortcomings, Mr. Davis has shown that he will continue to provide the same value through adversity. For these reasons, Mr. Davis respectfully requests this arbitration award him a 2013 salary of $3 million.

Thank you for your consideration.

Respectfully,

Team 22

\(^{51}\) Id.

\(^{52}\) Id.


\(^{54}\) Id. at [http://espn.go.com/mlb/team/_/name/nym/new-york-mets](http://espn.go.com/mlb/team/_/name/nym/new-york-mets)