TULANE BASEBALL ARBITRATION COMPETITION

Isaac Benjamin Davis

v.

New York Metropolitan Baseball Club, Inc.

ARBITRATION BRIEF FOR ISAAC BENJAMIN DAVIS

Team 25
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I. INTRODUCTION AND REQUEST FOR HEARING DECISION

This brief analyzes the assets and contributions of left-handed first basemen Isaac Benjamin Davis ("Davis") to be reflected in his 2012 contract with the New York Metropolitan Baseball Club, Inc. (the "Club" or the "Mets"). The Major League Baseball ("MLB") Collective Bargaining Agreement ("CBA") between MLB Clubs and the MLB Players Association set the criteria to be considered in this arbitration hearing.\(^1\) Under the CBA Article VI, Section E, Paragraphs 10(a)-(b), the criteria to be considered in this arbitration hearing include: (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.\(^2\) The arbitration panel shall give particular attention, for comparative salary purposes, to the contracts of Players with Major League service not exceeding one annual service group above the Player’s annual service group.\(^3\) Evidence of the following shall not be admissible: (1) the financial position of the Player and the Club; (2) press comments or similar materials 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; and (5) salaries in other sports or occupations.\(^4\)

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\(^2\) Id. at ¶10(a).

\(^3\) Id.

\(^4\) Id. at ¶10(b).
Mr. Davis has reached 2.168 years of MLB service entitling him to file for first-year arbitration. The evidence of his past successes and future potential presented in this brief demonstrates that Mr. Davis is fairly entitled to a salary exceeding the $2.7 million midpoint between his final offer and that of the Club. Mr. Davis respectfully requests that the arbitration panel find that he is entitled to a 2013 salary arbitration award of $3 million.

II. THIS ARBITRATION PANEL SHOULD AWARD DAVIS $3 MILLION BECAUSE THE CRITERIA WEIGHS IN FAVOR OF DAVIS’ FINAL OFFER.

A. **Davis’ 2012 Contribution to the Mets Favors an Award of $3 Million**

In considering whether to award to Mr. Davis his or the Mets’ final offer, this Panel may consider Davis’ contribution to the Mets during this past 2012 MLB season, which includes Mr. Davis’ overall performance, special qualities of leadership, and public appeal.5

<table>
<thead>
<tr>
<th>Table 16</th>
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</thead>
<tbody>
<tr>
<td>Isaac Davis</td>
</tr>
<tr>
<td>2012 Splits</td>
</tr>
<tr>
<td>Pre-AS</td>
</tr>
<tr>
<td>Post-AS</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

After sitting out a vast majority of the 2011 season due to injury, Davis began 2012 being diagnosed with Valley Fever7 and found himself in the worst hitting slump of his career, his average dipping to .158 on June 8.8 Despite hitting at a career low, Davis still managed to hit 12 home runs, enough for sixth best of all National League first basemen9, and drive in 49 RBIs, tied for second most of all National League first basemen and tied for eighteenth of all National

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5 Id. at ¶10(a).
League players. Davis’ home run total led the Mets in the first half and his RBI output was second on the Club.

Davis broke out of his slump in after the All-Star break, hitting .255 with an OPS of .888, the latter being the highest of all National League first basemen and the ninth highest of all National League players with at least 200 at-bats. Moreover, his post-All Star OPS was fifth best of all Major League first basemen with a minimum of 150 at-bats. After the All Star break, Davis led all National League first basemen with a .542 slugging percentage and all Major League first basemen in home runs, hitting a total of 20 in 80 games. Davis’ second-half contribution also established himself as one of the Mets’ best and most consistent players. Davis led the Club in OPS, home runs, and RBIs and had the highest OBP of all Mets players with more than 150 at-bats.

Despite the slow start to the 2012 season, Davis’ year-end offensive statistics offers only a small window into what he can contribute to the Mets. Coming off a season-ending ankle injury in 2011, Davis’ 32 total home runs led the Club, was second best of all National League first basemen, and was fifth most of all National League players. His 90 RBIs were second on

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the Club\textsuperscript{25} and just fifth out of all National League first basemen.\textsuperscript{26} Davis .771 OPS was also third best on the Club, out of all players with at least 200 at-bats.\textsuperscript{27}

Table 2\textsuperscript{28}

<table>
<thead>
<tr>
<th>Season</th>
<th>Isaac Davis</th>
<th>New York Mets</th>
<th>2012 Defensive Statistics</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>GP</td>
<td>GS</td>
<td>Inn</td>
</tr>
<tr>
<td>2012</td>
<td>148</td>
<td>137</td>
<td>1222.1</td>
</tr>
</tbody>
</table>

Davis put together a very solid defensive year for the Mets. His .994 fielding percentage was the best on the Club\textsuperscript{29} and fifth best of all National League first basemen.\textsuperscript{30} Moreover, Davis had only one more error, 8, than 2012 Gold Glove winner Adam LaRoche.\textsuperscript{31}

All in all, Davis had a very successful year at the plate and in the field for the Mets and with an injury-free season behind him, Davis looks to continue his power hitting and run-driving potential into 2013 and beyond.

B. Davis’ Career Consistency Favors an Award of $3 Million.

The Mets selected Davis, then 21 years old and ranked the third best collegiate power hitter by Baseball America, with their first pick in the 2008 amateur draft.\textsuperscript{32} Upon assignment to the Mets’ Single-A affiliate in Brooklyn, Davis quickly ascended the farm system, getting to AAA Buffalo by the beginning of the 2010 season.\textsuperscript{33} Davis earned awards while in the minor leagues, including being named to the 2009 Arizona Fall League Rising Stars Game\textsuperscript{34} after being honored as the Sterling Organizational Player of the Year by the Mets.\textsuperscript{35} Over his minor league

\textsuperscript{26} MLB Player Batting Stats, ESPN, http://espn.com/mlb/stats/batting/_/position/1b/league/nl/sort/RBIs/order/false.
\textsuperscript{34} Ike Davis, MLB.COM, http://mlb.com/team/player.jsp?player_id=477195
career, Davis hit .288 overall with a .371 on-base percentage, .467 slugging percentage, and .837 OPS percentage.\(^{36}\)

Davis made his Major League debut on April 19, 2010, just after turning 23 years old, and quickly made an impact on the Mets’ organization, continuing his success form the minors.\(^{37}\)

**Table 3**\(^ {38}\)

<table>
<thead>
<tr>
<th>Season</th>
<th>G</th>
<th>AB</th>
<th>R</th>
<th>H</th>
<th>2B</th>
<th>3B</th>
<th>HR</th>
<th>RBI</th>
<th>SB%</th>
<th>BB</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>147</td>
<td>523</td>
<td>73</td>
<td>138</td>
<td>33</td>
<td>1</td>
<td>19</td>
<td>71</td>
<td>3</td>
<td>60%</td>
<td>.264</td>
<td>.351</td>
<td>.440</td>
<td>.791</td>
</tr>
<tr>
<td>2011</td>
<td>36</td>
<td>129</td>
<td>20</td>
<td>39</td>
<td>8</td>
<td>1</td>
<td>7</td>
<td>25</td>
<td>0</td>
<td>0%</td>
<td>.302</td>
<td>.383</td>
<td>.543</td>
<td>.925</td>
</tr>
<tr>
<td>2012</td>
<td>156</td>
<td>519</td>
<td>66</td>
<td>118</td>
<td>26</td>
<td>0</td>
<td>32</td>
<td>90</td>
<td>0</td>
<td>0%</td>
<td>.227</td>
<td>.308</td>
<td>.462</td>
<td>.771</td>
</tr>
<tr>
<td>Career</td>
<td>339</td>
<td>1171</td>
<td>159</td>
<td>295</td>
<td>67</td>
<td>2</td>
<td>58</td>
<td>186</td>
<td>3</td>
<td>43%</td>
<td>.252</td>
<td>.336</td>
<td>.461</td>
<td>.797</td>
</tr>
</tbody>
</table>

After his successful rookie season in 2010, Baseball America named Davis to its All-Rookie Team as a first baseman.\(^ {39}\) Davis also finished seventh in Rookie of the Year voting, receiving two third-place votes.\(^ {40}\) Davis started his second season with the Mets in 2012 hitting .302 with 7 home runs and 25 RBIs and an outstanding .925 OPS percentage.\(^ {41}\) Unfortunately, Davis suffered a severe ankle injury after colliding with Mets’ third baseman David Wright in a game in Colorado on May 10, 2011.\(^ {42}\) Cartilage damage and a bone bruise from the collision kept Davis out for the remainder of the 2011 season; however, had Davis kept his offensive pace, Davis would have hit about 31 home runs and drove in 112 RBIs, putting him top ten in both categories in the whole National League.\(^ {43}\) After fully recovering from his ankle injury, Davis returned to the Mets’ starting lineup in 2012 and played the entire season without once going on

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\(^{37}\) Id.

\(^{38}\) Id.


\(^{41}\) See Table 3.


the disabled list. Although Davis’ first half was well below his career average offensively, his post-All Star break numbers evinced his potential as a healthy first baseman for the Mets. In fact, his second-half batting average, 255, was above his career batting average, further suggesting that Davis’ offensive potential has yet to be realized. Moreover, his 32 home runs and 90 RBIs showcase his ability to become one of the best power hitters and run-producers in the Major Leagues.

Table 4

<p>| | | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>GP</td>
<td>GS</td>
<td>Inn</td>
<td>PO</td>
<td>A</td>
<td>E</td>
<td>FLD%</td>
<td>RF/9</td>
</tr>
<tr>
<td>330</td>
<td>314</td>
<td>2802.1</td>
<td>2682</td>
<td>210</td>
<td>18</td>
<td>.994</td>
<td>9.29</td>
</tr>
</tbody>
</table>

Additional proof of Davis’ career consistency lies in his defensive abilities. Since joining the Mets in 2010, Davis had committed only 18 errors and boasts a fielding percentage of .994. In fact, Davis has not committed 10 errors in a single season once and, when looking at his two full seasons, committed a career low in 2012. Since 2010, Davis ranks in the top 20 in fielding percentage and the top 15 in least errors committed of all major league first basemen.

Clearly, Davis’ consistency through only 2 full Major League seasons in terms of his offensive and defensive performance makes him a valuable asset for the Mets worth Davis’ $3 million final offer.

C. Davis’ Submission of $3 Million Matches Davis’ Historical Salary Schedule.

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45 See Table 4.
48 FANGRAPHS, http://www.fangraphs.com/leaders.aspx?pos=1b&stats=fld&lg=all&qual=2000&type=0&season=2012&month=0&season1=2010&ind=0&team=0&rost=0&age=0&filter=&players=0&sort=9,a
Since being called up to the Major Leagues in 2010, the Mets have paid Davis a salary at or near the league minimum.\textsuperscript{49} By the end of the 2012 season, Davis had obtained 2.168 years of MLB service time, yielding his eligibility for arbitration as a Super-2.\textsuperscript{50} After being paid just over $500,000 in 2012, Davis is rightfully due a $2.5 million raise since his total output for the Mets, both statistically and total games played, far exceeded his 2011 contribution.

D. \textbf{In Determining Davis’ Salary, the Arbitration Panel Should Compare Davis to Similar First Basemen such as James Loney and Michael Jacobs.}

If the Arbitration Panel determines that Davis’ last best offer is appropriate, Davis will earn a 2013 salary that is analogous to the salaries of statistically comparable first basemen.

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|c|c|c|c|c|c|c|c|c|c|c|c|}
\hline
\hline
\hline
MLB Service Time at Contract: 2.168 years & & & & & & & \hline
G & AB & R & H & 2B & 3B & HR & RBI & SB & SB% & BB & AVG & OBP & SLG & OPS & A & E & RF & FPCT \\
\hline
Platform & 156 & 519 & 66 & 118 & 26 & 0 & 32 & 90 & 0 & 0% & 61 & .227 & .308 & .462 & .771 & 71 & 8 & 9.03 & .994 \\
\hline
James Loney & Los Angeles Dodgers & 2009 Salary: $465,000 & & & & & \textbf{2010 Salary Award: $3,100,000} & & & & & & & \\
\hline
\hline
MLB Service Time at Contract: 3.012 years & & & & & & & \hline
G & AB & R & H & 2B & 3B & HR & RBI & SB & SB% & BB & AVG & OBP & SLG & OPS & A & E & RF & FPCT \\
\hline
\hline
Michael Jacobs & Kansas City Royals & 2008 Salary: $395,000 & & & & & \textbf{2009 Salary Award: $3,275,000} & & & & & & & \\
\hline
\hline
MLB Service Time at Contract: 3.047 years & & & & & & & \hline
G & AB & R & H & 2B & 3B & HR & RBI & SB & SB% & BB & AVG & OBP & SLG & OPS & A & E & RF & FPCT \\
\hline
\hline
\end{tabular}
\caption{Table 5}
\end{table}

Davis’ 2012 performance was statistically similar to the platform year performance of James Loney (“Loney”), which resulted in a one-year, $3.1 million contract for 2010 from the

\textsuperscript{50} Id.
Los Angeles Dodgers – only $100,000 more than Davis’ final offer.\(^{52}\) Despite playing in two less games and having 57 fewer at-bats, Davis outperformed Loney by hitting one more double and 19 more home runs, and by having a higher slugging percentage and OPS.\(^{53}\) Also, Davis’ 90 RBIs equaled Loney’s RBI output and Davis only had nine fewer walks.\(^{54}\) Importantly, Davis’ obtained his statistics while playing on a team that ranked 12th in runs scored in the National League\(^{55}\) while Loney played on a Dodger team that ranked 4th.\(^{56}\) Defensively, both players were nearly identical, with Loney committing only one less error and having a fielding percentage only .001 better than Davis.\(^{57}\) Moreover, upon review of both players’ careers up to their first year of arbitration eligibility, Davis should be valued at least as high, if not higher, than Loney. For instance, although Davis played in 124 less games and had 446 fewer at-bats, he managed to hit 13 more home runs than Loney.\(^{58}\) At similar points in their careers, Davis also has a higher slugging percentage and fielding percentage, and has an OPS nearly identical to Loney.\(^{59}\) After comparing Davis’ platform and career numbers to those of the similarly situated Loney, Davis’ $3 million final offer, $100,00 less than that awarded to Loney, is a more reasonable estimate of his value than the Mets’ final offer of $2.4 million.

Davis’ request for $3 million following his successful 2012 season is also comparable to Michael Jacobs’ (“Jacobs”) 2008 platform season, which netted him a one-year contract for $3.275 million from the Kansas City Royals. Offensively, Jacobs arguably had a more productive season; however, Davis’ plate discipline was much better, resulting in 25 more walks

\(^{53}\) See Table 5.
\(^{54}\) Id.
\(^{57}\) See Table 5.
\(^{58}\) Id.
\(^{59}\) Id.
and a higher on-base percentage than Jacobs.\textsuperscript{60} Defensively, on the other hand, Davis was far superior. While playing in 15 more games than Jacobs, Davis committed three fewer errors and had much better fielding percentage.\textsuperscript{61} Davis’ case for a $3 million award is further supported when comparing his career statistics with those of Jacobs. Numerically, despite playing in 82 fewer games and having 301 fewer at-bats, Davis earned more walks, had a higher on-base percentage, made more defensive assists, had fewer errors and recorded a higher fielding percentage and range factor rating than Jacobs.\textsuperscript{62} In 100 at-bats, Davis averages more runs scored and walks generated than Jacobs. Where Davis trails Jacobs offensively, however, such difference is negligible, suggesting that these two players should be valued similarly.

\textbf{Table 6}\textsuperscript{63}

<table>
<thead>
<tr>
<th>Batting per 100 At-Bats (Career)</th>
<th>Fielding per 9 Innings (Career)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>( R )</td>
</tr>
<tr>
<td>Davis</td>
<td>13.6</td>
</tr>
<tr>
<td>Jacobs</td>
<td>13.4</td>
</tr>
</tbody>
</table>

Moreover, when comparing each player’s defensive statistics, it is clear that Davis is the more valuable asset to his team since, for every 9 innings played, Davis averages more put outs and assists and fewer errors than Jacobs.\textsuperscript{64} After comparing Davis’ platform and career numbers to those of Jacobs, Davis’ $3 million final offer, $250,00 less than that awarded to Loney, is a more reasonable estimate of his value than the Mets’ final offer of $2.4 million.

\textbf{E. Davis is Not Injury Prone and Does Not Pose a Contractual Risk to the Mets}

\textsuperscript{60} See Table 5.
\textsuperscript{61} See Table 5.
\textsuperscript{62} See Table 5.
\textsuperscript{63} See Table 6.
Through three years and a total of 339 games, Davis has only been to the disabled list one time, for a severe ankle injury that sidelined Davis for 123 games in 2011. However, the 2011 season aside, Davis has missed only 9 games out of a total of 312 games. In fact, Davis never sat out consecutive games in either 2010 or 2012. Davis’ remarkable ability to stay healthy enough to positively contribute to the Mets, even when battling illness such as Valley Fever and food poisoning, indicates his physical ability to remain a full-time asset to the Mets without risk of debilitating injury. Aside from his physical health, Davis has shown an incredible mental strength and no apparent defects over the course of his career. Case in point was the 2012 season, where after struggling to hit for the first few months of the season, Davis was able to turn it around and lead the team in numerous offensive and defensive categories by the end.

Pooled together, Davis’ physical and mental toughness is and will continue to be a valuable asset to the Mets. Davis, who will be only 26 on Opening Day 2013, can be counted on to maintain his health and remain off the disabled list for the Mets, which further supports an arbitration award of $3 million.

F. Despite Davis’ Strong Performance, the Mets Have Not Had a Winning Season Since 2008.

Going into the 2012 season, the Mets had not had a winning season since 2008 and had finished fourth in the National League East Division for three straight years. Unfortunately, the Club maintained the status quo, winning only 74 games while losing 88, resulting in the Club’s

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66 Id.
67 Id.
worst winning percentage since 2009.\textsuperscript{71} After posting a winning record in each of the first three months and being within half a game of a Wild Card spot at the All-Star break, the Mets won only seven games in the month of July, while losing 18, and were unable to attain a winning record in any of the remaining months of the 2012 regular season.\textsuperscript{72} Despite the Club’s lackluster second half, the total attendance at Citi Field was 2,370,794, which averaged to 30,010 fans per game, ranking 17 of out of the 30 Major League ballclubs.\textsuperscript{73} Ultimately, the Mets finished fourth in the NL East Division for the fourth season in a row, 24 games behind the division champion Nationals\textsuperscript{74} and 14 games out of the Wild Card.\textsuperscript{75}

The Mets’ 2012 futility can be attributed to both their offense and pitching, which both finished in the bottom half in the National League in a slew of different statistics.\textsuperscript{76} However, Davis’ contribution exceeded that of his teammates, being one of only two players to hit more than 20 home runs and drive in at least 60 RBIs.\textsuperscript{77}

III. CONCLUSION

Davis’ final offer of $3 million is fair compensation for the Mets to retain Davis’ services for the 2013 MLB season and is more indicative of his value than the Mets’ final offer of $2.4 million. Davis has established himself as one of the most promising young power hitters in baseball who delivers consistently through the season on both offense and defense. Davis remains one of the healthier players in baseball, having only been on the disabled list one time and not otherwise missing consecutive games. The Mets would struggle to find another first baseman who provides comparable offensive production and defensive consistency, while only

\textsuperscript{71} Id.
\textsuperscript{74} MLB Standings, ESPN, http://espn.com/mlb/standings.
\textsuperscript{75} MLB Standings, ESPN, http://espn.com/mlb/standings/ /type/wild-card.
being 26 years of age. From the foregoing, Davis respectfully requests that the Arbitration Panel consider these factors and award Davis $3 million as a more equitable estimation of Davis’ value for the 2013 MLB season.