Ike Davis vs. New York Mets
Submission of $3 million on behalf of Ike Davis
By: Team 3
Midpoint: $2.75 million
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I. Introduction and Request for Hearing Decision

This brief analyzes the contributions and athletic prowess of New York Mets (herein “Club” or “Mets”) first baseman Ike Davis (herein “Player” or “Davis”). Major League Baseball’s Collective Bargaining Agreement governs this arbitration hearing and sets forth the following criteria by which this salary arbitration case is presented: 1) the quality of contributions to the club this past season; 2) the length and consistency of career contributions; 3) comparative baseball salaries; 4) the existence of any mental or physical defects; 5) the recent performance of the Club; and 6) past compensation. In light of these criteria, Davis is worth a salary exceeding the $2.75 million midpoint and respectively requests that this Panel find him entitled to an award of $3 million for the 2013 season.

II. Existence of Mental and Physical Defects

The past two years have not been kind to Davis. In 2011, Davis missed all but 36 games after colliding with third baseman David Wright when attempting to field a routine infield pop-up. During the winter off-season, Davis rehabbed the ankle sprain, losing some athleticism heading into 2012 spring training. Unfortunately, prior to his 2012 start, news also broke that Davis has contracted a rare fungal disease known as Valley Fever, leaving Davis fatigued.

For Davis, it is not a question of whether or not he is ready for 2013. Undoubtedly, Davis lost rhythm of the game in 2012, having been out so long before, but this year will be different. Davis is going into spring training with more energy and

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1 MLB Collective Bargaining Agreement
3 Id.
strength than the last, looking to build on the strong second half of the 2012 season. Given his clean bill of health and optimism, the Mets can rest assured with Davis in 2013.

III. Quality of Player’s Contributions During Past Season

It is understandable for any ball player returning from injury to struggle initially adjusting at the plate. Not surprisingly then, Davis had a disappointing start to 2012. Nonetheless, Davis recovered and finished the season with an attractive .227/.770/.462 slash-line.

<table>
<thead>
<tr>
<th>Table 1: Ike Davis All-Star Split 2012</th>
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</thead>
<tbody>
<tr>
<td>SPLIT</td>
</tr>
<tr>
<td>Pre-All Star</td>
</tr>
<tr>
<td>Post-All Star</td>
</tr>
</tbody>
</table>

Davis came back from the All-Star break slugging .542 and batting .255 with 41 RBI. Davis averaged a homerun for every 13 at-bats. Davis had a .346 OBP and the highest OPS of any NL first baseman (.888). He managed a lot of walks, 31 in the last three months of the season. Davis is a power hitter, leading the Mets in homeruns for the season (32) and finishing 5th in the NL. In one remarkable performance on July 28th, Davis had 3 homers, a career-high. Davis is one of the few players in the current line-up that can consistently be relied on for production.

Defensively, Davis is solid. Among active NL first basemen, Davis ranked 3rd in most games played and 4th in double plays with 106. He finished the season with a .994 fielding percentage, compared to the .995 NL high for first-basemen, and committed 8

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5 Id.
errors. Davis excels at first base, and his defensive magic enables the rest of the Mets’ infield to perform better.

IV. Length and Consistency of Career Contribution

Davis has had a substantial amount of success in his first three seasons playing major league ball. Drafted as the 18th overall pick out of Arizona State University in 2008, Davis landed himself in the Majors at the start of 2010. Not one to disappoint, Davis lived up to his hype, finishing his first season 2nd of all NL rookies in runs (73), doubles (33), walks (72), extra-base hits (53), on base percentage (.351), and OPS (.791). Davis finished 3rd in RBI (71) and slugging (.440) and tied for homeruns (19). He was 7th in voting for Rookie of the Year. Davis had the bat and infield technique, and Mets fans had renewed energy.

<table>
<thead>
<tr>
<th>Year</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>147</td>
<td>73</td>
<td>138</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>36</td>
<td>20</td>
<td>39</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>156</td>
<td>66</td>
<td>118</td>
<td>32</td>
<td>90</td>
<td>0.227</td>
<td>0.308</td>
<td>0.462</td>
<td>0.770</td>
</tr>
<tr>
<td>Career</td>
<td>339</td>
<td>159</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>

Davis put up even better numbers in 2011. Unfortunately, Davis’ season was cut short due to a season-ending ankle injury sustained in May. Yet, in just 139 at-bats that year, Davis was able to average .302 with a .925 OPS. Moreover, in those 36 games, Davis had 7 homeruns and 25 RBI. Then in 2012, Davis had an unfortunate start,
struggling at-bat. However, by the second half of the season, Davis was hitting as expected and finished the season once again putting up big numbers, ending the year with 32 homers and 90 RBI.

Davis’ first year in the Majors (2010) and this past year (2012) are Davis’ only full seasons of play, and Davis consistently produced in both of those years, driving in at least 70 RBI, hitting 19 or more homeruns, and scoring at least 60 runs. Had Davis not missed more than half of the 2011 season, his pace of 1 homerun every 5 games would have easily put him producing 30+ jacks on the season. Even considering his mild struggles, Davis managed to show great ability at the plate and is someone who can be relied upon for steady year-to-year production.

Davis is an above average first baseman. In 2012, he committed 8 errors compared to his 9 in 2010. His fielding percentage is trending in the right direction, reaching .994 in 2012. Advanced metrics favored Davis in 2010, and his UZR/150 of 11.9 even prompted talk as to whether Davis might win a Gold Glove. Davis also competed for the first baseman Fielding Bible Award that year with 12 runs saved.

V. Comparative Baseball Salaries

For the purposes of establishing Davis’ value to the club, it is useful to compare his platform season and career statistics with those of Mike Jacobs (hereinafter “Jacobs”), James Loney (hereinafter “Loney”), and Kevin Kouzmanoff (hereinafter “Kouzmanoff”).

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16 Id.
These comparisons clearly indicate Davis’ value is above the $2.75 million midpoint and, as such, this panel should decide in his favor.

a. **Mike Jacobs – 1B ($3.275 million in 2009)**

Comparing Davis to Jacobs establishes Davis’ worth at a value above the $2.75 million midpoint. Following the 2008 season, Jacobs received a one-year deal worth $3.275 million.²⁰

<table>
<thead>
<tr>
<th>Table 3: Platform Season²⁰</th>
<th>MLS</th>
<th>Value</th>
<th>GP</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>AVG</th>
<th>OBP</th>
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</thead>
<tbody>
<tr>
<td>Ike Davis</td>
<td>2.168</td>
<td>$2.75 mil</td>
<td>156</td>
<td>66</td>
<td>118</td>
<td>32</td>
<td>90</td>
<td>0.227</td>
<td>0.308</td>
</tr>
<tr>
<td>Mike Jacobs</td>
<td>3.047</td>
<td>$3.25 mil</td>
<td>141</td>
<td>67</td>
<td>118</td>
<td>32</td>
<td>93</td>
<td>0.247</td>
<td>0.299</td>
</tr>
</tbody>
</table>

The chart above shows the similarities between Davis and Jacobs’ platform seasons. While Davis had less Runs (66 to 67) and RBIs (90 to 93) than Jacobs, Davis matched Jacobs in Hits (118) and HRs (32). Davis also posted a lower AVG than Jacobs (.227 to .247), but made up for this with a better OBP (.308 to .299).

<table>
<thead>
<tr>
<th>Table 4: Platform Season Split²¹</th>
<th>MLS</th>
<th>Value</th>
<th>GP</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
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</thead>
<tbody>
<tr>
<td>Ike Davis</td>
<td>2.168</td>
<td>$2.75 mil</td>
<td>75</td>
<td>36</td>
<td>64</td>
<td>20</td>
<td>41</td>
<td>0.255</td>
<td>0.346</td>
<td>0.542</td>
<td>0.888</td>
</tr>
<tr>
<td>Mike Jacobs</td>
<td>3.047</td>
<td>$3.25 mil</td>
<td>60</td>
<td>28</td>
<td>49</td>
<td>13</td>
<td>41</td>
<td>0.255</td>
<td>0.326</td>
<td>0.531</td>
<td>0.857</td>
</tr>
</tbody>
</table>

Davis’ rough start to the 2012 season was not surprising considering he was coming off of an ankle injury and battling Valley Fever at the same time. Davis’ statistics following the All-Star break demonstrate what can be expected of Davis in the 2013 season. During this period, Davis put up the same RBIs as Jacobs (41), and had more Runs (36 to 28), Hits (64 to 49), and HRs (20 to 13). Further, Davis matched Jacobs AVG (.255), and exceeded Jacobs’ batting percentages in the following statistics: OBP (.346 to .326), SLG (.542 to .531), and OPS (.888 to .857).

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²¹ Id.
Table 5: Career

<table>
<thead>
<tr>
<th>MLS</th>
<th>Value</th>
<th>GP</th>
<th>R</th>
<th>AVG</th>
<th>OBP</th>
<th>OPS</th>
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</thead>
<tbody>
<tr>
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<td>2.168</td>
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<td>339</td>
<td>159</td>
<td>0.252</td>
<td>0.336</td>
</tr>
<tr>
<td>Mike Jacobs</td>
<td>3.047</td>
<td>$3.25 mil</td>
<td>421</td>
<td>197</td>
<td>0.262</td>
<td>0.318</td>
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Further, Davis and Jacobs have put up similar numbers over their careers. Despite Davis having played in 82 games less than Jacobs, Davis is not far behind in Runs (159 to 197). Davis and Jacobs also have similar batting percentages over their respective careers: AVG (.252 to .262), OBP (.336 to .318), and OPS (.797 to .816).

Due to the similarities between Davis and Jacobs’ during their platform season and careers, Davis’ value matches that of Jacobs’ -- $525k in excess of the $2.75 million midpoint.

b. James Loney – 1B ($3.1 million in 2010)

Comparing Davis to Loney also shows that Davis’ value exceeds the $2.75 million midpoint. After the 2009 season, Loney signed a one-year $3.1 million deal, $350k in excess of the $2.75 million midpoint before the panel today.²³

Table 6: Platform Season

<table>
<thead>
<tr>
<th>MLS</th>
<th>Value</th>
<th>GP</th>
<th>HR</th>
<th>RBI</th>
<th>AVG</th>
<th>SLG</th>
<th>OPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ike Davis</td>
<td>2.168</td>
<td>$2.75 mil</td>
<td>156</td>
<td>32</td>
<td>90</td>
<td>0.227</td>
<td>0.462</td>
</tr>
<tr>
<td>James Loney</td>
<td>3.012</td>
<td>$3.1 mil</td>
<td>158</td>
<td>13</td>
<td>90</td>
<td>0.281</td>
<td>0.399</td>
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</table>

During their platform seasons, Davis and Loney played in almost the same amount of games (156 to 158). During this time, Davis tied Loney in RBIs (90), and exceeded Loney in HRs (32 to 13). Davis’ AVG is lower than Loney’s (.227 to .281), but Davis shows that he has more power with his swing by outperforming Loney in SLG (.462 to .399) and OPS (.770 to .756).

²² Id.
During the second half of the season, Davis and Loney played in a comparable number of games (75 to 71), and Davis exceeded Loney in Runs (36 to 30), HRs (20 to 6), and RBIs (41 to 36). Davis’ AVG was also closer to Loney’s in the second half of the season (.255 to .282), and Davis outperformed Loney by over a full point in SLG (.542 to .369) and OPS (.888 to .762).

The chart above indicates that Davis and Loney have comparable career numbers. While Davis has played in fewer games than Loney (339 to 462), Davis is close in Runs (159 to 200), and has hit more HRs than Loney (58 to 45). While Davis has a lower career AVG than Loney (.252 to .295), Davis is closer in OPS (.797 to .806), and exceeds Loney in SLG (.461 to .451).

The above statistics illustrate that Davis hits with more power than Loney, having more HRs and a higher SLG percentage in both his platform season and throughout his career. Therefore, Davis’ value at least matches that of Loney, if not exceeds it, placing Davis above the $2.75 million before this panel.

c. **Kevin Kouzmanoff – 3B ($3.1 million in 2010)**

Lastly, comparing Davis to Kouzmanoff dictates that Davis’ value exceeds the $2.75 million midpoint. Following the 2009 season, Kouzmanoff signed a one-year deal worth $3.1 million.\(^{27}\)

\(^{25}\) Id.
\(^{26}\) Id.
\(^{27}\) Id.
Table 9: Platform Season

<table>
<thead>
<tr>
<th></th>
<th>MLS</th>
<th>Value</th>
<th>GP</th>
<th>R</th>
<th>HR</th>
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<td>0.227</td>
<td>0.308</td>
<td>0.462</td>
<td>0.770</td>
</tr>
<tr>
<td>Kevin Kouzmanoff</td>
<td>3.030</td>
<td>$3.1 mil</td>
<td>141</td>
<td>50</td>
<td>18</td>
<td>88</td>
<td>0.255</td>
<td>0.302</td>
<td>0.420</td>
<td>0.722</td>
</tr>
</tbody>
</table>

During their platform seasons, Davis outperformed Kouzmanoff in the following statistics: Runs (66 to 50), HRs (32 to 18), and RBIs (90 to 88). While Davis posted a lower AVG than Kouzmanoff (.227 to .255), Davis made up for this by outperforming Kouzmanoff in every other category: OBP (.308 to .302), SLG (.462 to .420), and OPS (.770 to .722).

Table 10: Platform Season Split

<table>
<thead>
<tr>
<th></th>
<th>MLS</th>
<th>Value</th>
<th>GP</th>
<th>R</th>
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<td>75</td>
<td>36</td>
<td>20</td>
<td>41</td>
<td>0.255</td>
<td>0.346</td>
<td>0.542</td>
<td>0.888</td>
</tr>
<tr>
<td>Kevin Kouzmanoff</td>
<td>3.030</td>
<td>$3.1 mil</td>
<td>56</td>
<td>19</td>
<td>6</td>
<td>41</td>
<td>0.274</td>
<td>0.335</td>
<td>0.443</td>
<td>0.778</td>
</tr>
</tbody>
</table>

Davis also had a better second half of the season than Kouzmanoff, exceeding Kouzmanoff in Runs (36 to 19) and HRs (20 to 6), and posting the same number of RBIs (41). Davis’ AVG was closer to Kouzmanoff’s in the second half of the season (.255 to .274), and Davis’ batting percentages exceeded Kouzmanoff’s in OBP (.346 to .355), SLG (.542 to .443), and by a full point in OPS (.888 to .778).

Table 11: Career

<table>
<thead>
<tr>
<th></th>
<th>MLS</th>
<th>Value</th>
<th>GP</th>
<th>R</th>
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<td>58</td>
<td>0.252</td>
<td>0.336</td>
<td>0.461</td>
<td>0.797</td>
</tr>
<tr>
<td>Kevin Kouzmanoff</td>
<td>3.030</td>
<td>$3.1 mil</td>
<td>456</td>
<td>182</td>
<td>62</td>
<td>0.261</td>
<td>0.308</td>
<td>0.435</td>
<td>0.743</td>
</tr>
</tbody>
</table>

Despite playing in over 100 games less than Kouzmanoff at this point of his career, Davis is very close to Kouzmanoff in HRs (58 to 62). Davis’ AVG is also closest to Kouzmanoff’s throughout their respective careers (.252 to .261), and Davis exceeds Kouzmanoff in OBP (.336 to .308), SLG (.461 to .435), and OPS (.797 to .743).

29 Id.
30 Id.
Davis hits with more power than Kouzmanoff, exceeding him in OBP, SLG, and OPS throughout their platform seasons and careers, as well as posting more Runs, HRs, and RBIs than Kouzmanoff during their platform seasons. This clearly illustrates that Davis’ value is at least commensurate with Kouzmanoff’s, if not exceeding it – placing Davis $350k above the $2.75 midpoint before this panel today.

VI. Recent Performance of the Club

The Mets concluded the 2012 season finishing 4th in the NL East for the fourth consecutive year, just 24 games back from the division leader, the Washington Nationals. Despite what was anticipated to be a dismal season, the Mets finished with a 74-88 record. With a lawsuit stemming from the Bernie Merdoff Ponzi scheme now settled, the team appears to be in a strong position headed into the 2013 season. The Mets are serious about contending in 2013 and achieving long-term success. Accordingly, the organization is determined to be a power-oriented team. Davis is critical to such an ambition given both his Golden-glove caliber defense and dangerous bat. Davis has all the makings of a future All-Star.

VII. Past Compensation

A little over 2 weeks into the 2010 season, the Mets selected Davis’ minor league contract from Triple-A Buffalo. Davis was re-signed in 2011 to a one-year $432,000 contract, just over league minimum. In 2012, Davis received a slight raise and re-signed for another year for $506,960, again slightly above league minimum.
Davis has acquired enough major league service time to legitimize him for salary arbitration for the first time in his major league career. As a “Super Two,” Davis falls in the top 22% of players who have between 2 and 3 years of service time and at least 86 days of service time during the previous season. Davis is confident that his last best offer of $3 million dollars is a fair reflection of his club contributions.

VIII. Conclusion

While Davis’ platform year was initially questionable, Davis really showed up after the All-Star break and wound up having a good year at the plate as well as defensively, two qualities that are hard to come by for league-minimum salary. During his platform season, Davis exceeded Loney and Kouzmanoff in HRs, and posted the same number of HRs as Jacobs. Further, Davis posted a higher OBP than Jacobs, a higher SLG and OPS than Loney, and a higher OBP/SLG/OPS than Kouzmanoff. After the All-Star break, Davis had the same AVG as Jacobs and a higher OBP/SLG/OPS, he had a higher SLG and OPS than Loney, and exceeded Kouzmanoff in OBP/SLG/OPS.

Davis is a special hitter and is someone who can easily contend for a home run title in 2013. He is a player the Mets can feel confident building around. After reviewing the criteria that has been presented, Davis respectively asks that this Panel determine the $3 million salary submission to be fair compensation for the Mets retention of his services in 2013.

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36 MLB Collective Bargaining Agreement