2013 NATIONAL BASEBALL ARBITRATION COMPETITION

Ike Davis v. The New York Mets Baseball Club
Submission on Behalf of Ike Davis
Submission by Team 30
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MLB Collective Bargaining Agreement, “2007-2011 Basic Agreement”, Article VI(F) §12(a)-(b). pp. 18-19

1. Introduction and Request for Hearing Decision

This brief analyzes the baseball skills and qualities of first baseman Ike Davis (“Mr. Davis”) that reflect his 2013 contract to be awarded by the New York Mets Baseball Club (the “Club” or the “Mets”). Mr. Davis, 25-years old, has accrued 2.168 years of Major League Baseball (“MLB”) service entitling him to file for first-year arbitration as a ‘Super 2’ player.\(^1\) The MLB Collective Bargaining Agreement (“CBA”) determines the criteria the panel may consider for an arbitration hearing.\(^2\) The relevant criteria for Mr. Davis are:

i. Mr. Davis was a steady defensive contributor and a top offensive performer for the Mets during the 2012 season;
ii. Mr. Davis has been a consistent player over his short three-year career with the Mets;
iii. Mr. Davis is not injury-prone, nor does he suffer from any physical or mental defects;
iv. Mr. Davis’ past compensation has been near the league minimum;
v. Mr. Davis’ offensive and defensive contributions are similar to other MLB first basemen with equivalent salaries, such as James Loney, Kendrys Morales and Jorge Cantu;
vi. The poor performance of the Club is not the result of Mr. Davis’ quality of play.

Together, these criteria demonstrate Mr. Davis as a premier power-hitting first basemen with elite offensive talent and reliable defensive abilities. It is respectfully submitted that the panel find Mr. Davis is entitled to a contract exceeding the midpoint of $2.7 million and grant a 2012 salary arbitration award of $3 million.

2. Analysis of the CBA Criteria

i. Quality of the Player’s Contributions During Past Season

Ike Davis had a strong 2012 season maintaining the stingy defensive play he displayed in 2010 and 2011, while improving on his offensive production. Following an injury-plagued 2011 season, Mr. Davis set career highs in home-runs (“HR”), runs batted-in (“RBI”), and slugging percentage (“SLG”) during his platform season. In 2012, Mr. Davis established himself as a

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\(^1\) Baseball Prospectus: Ike Davis’ Player Page: 
<http://www.baseballprospectus.com/card/card.php?id=DAVIS19870322A>

premier power-hitting first basemen when his 32 HR, 90 RBI, 66 walks and 0.462\(^3\) SLG ranked him 4th, 8th, 7th and 12th amongst all MLB first basemen.\(^4\) However, Mr. Davis’ focus on driving in more runs resulted in his AVG and OBP suffering. Nonetheless, during his platform season Mr. Davis exhibited great worth with his ability to change a game with one at-bat.

In 2012, Mr. Davis remained a reliable and dependable player, as he ranked 6th in GP, among all MLB first basemen. Defensively, Mr. Davis’ fielding percentage (“FLD”) of .994 and range per nine innings (“RF/9”) of 9.03 were around the MLB averages for first basemen.\(^5\) Although Mr. Davis’ defensive prowess trailed his offensive contributions, his demonstrated fielding capabilities and ability to play the majority of games are assets to the Club.

### TABLE 1: Ike Davis’ Platform Season Performance\(^6\)

<table>
<thead>
<tr>
<th>MLB Service: 2.198 years (01/2013)</th>
<th>First Baseman - 25 Years Old</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>G</td>
</tr>
<tr>
<td>2012</td>
<td>156</td>
</tr>
<tr>
<td>Rank(^7)</td>
<td>6</td>
</tr>
</tbody>
</table>

**ii. Length & Consistency of Career Contributions**

Mr. Davis was drafted by the Mets in the first round, 18th overall, during the 2008 amateur draft. Following three partial seasons in the minor league system, Mr. Davis made an immediate impact in his 2010 MLB debut and has since remained a top performer for the Club.

Over three seasons with the Club, Mr. Davis has produced 58 HR and 186 RBI in 339 GP, while accumulating a batting average (AVG) of 0.252 and SLG of 0.461. Mr. Davis’ career 162-game average reflects his significant offensive talent as his numbers would total 28 HRs and 89 RBIs and SLG of 0.461 over a full season.\(^8\)

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\(^4\) Fangraphs: 2012 MLB Leaderboards for 1B: <www.fangraph.com/leaders.aspx>; Note, to be eligible for such MLB leaderboards a player need to have a minimum 500 at-bats.
\(^5\) Id.: League averages were .992 (FLD) and 9.29 (RF/0). Mr. Davis ranked 13th and 16th respectively
\(^6\) See Note 3
\(^7\) See Note 4
\(^8\) See Note 3
Joining the Club’s MLB roster in 2010, Mr. Davis demonstrated his ability to produce offensively as he amassed 19 HRs, 71 RBIs and 73 runs over 147 GPs. With an on-base percentage (“OBP”) of 0.351 and SLG of 0.440, the Club eventually moved him to the clean-up spot in the batting order. Defensively, Mr. Davis exhibited great reliability as he achieved a FLD of .993 and RF/9 of 9.21, which were good for 13th and 6th among MLB first-basemen in 2010.\(^9\)

Across the league, Mr. Davis’ play on both sides of the plate did not go unnoticed as he finished 7th in voting for the National League (“NL”) Rookie of the Year award.\(^10\)

Following a successful rookie campaign, Mr. Davis was poised to become a star player. Mr. Davis’ 2011 season was cut short by an unfortunate injury, which must be accounted for by the panel.\(^12\) Despite 36 GP in 2011, Mr. Davis demonstrated offensive ability among the best MLB first basemen, as his season production would have totaled 31 HR, 112 RBI and 135 runs. These numbers would have ranked 5th, 4th and 1st respectively among MLB first basemen in 2011. His AVG of 0.302, OBP of 0.383 and SLG of 0.543 would have placed him 6th, 6th, and 5th respectively among MLB first basemen. Defensively, Mr. Davis performed equally well with a .0.994 FLD and RF/G of 8.92 that would have ranked 12th and 13th.\(^13\)

In 2012, Mr. Davis elevated his play to emerge as a top power-hitter in the MLB eclipsing previous numbers in HR and RBI. Overall, the statistics during Mr. Davis’ three-year

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\(^9\) Id.
\(^10\) See Note 4
\(^11\) See Note 1
\(^12\) Id.
\(^13\) See Note 4
career prove his elite ability to consistently produce offense. Furthermore, Mr. Davis’ versatility to contribute defensively demonstrates his upside to the Club. Mr. Davis’s performance in 2012 validates the Mets’ need to compensate him as a premier first basemen in the MLB.

iii. Existence of Physical or Mental Defects

Notwithstanding Mr. Davis’ severe ankle sprain suffered in 2011, he has been a durable player for the Club. On May 5, 2011 Mr. Davis was placed on the 60-day disabled-list causing him to miss the last 141 days and 126 games of the season. Mr. Davis demonstrated no ill-effects from the injury that sidelined him as he produced career highs in GP and several hitting statistics in 2012. Mr. Davis is not injury-prone, nor does he have any physical or mental defects.

iv. Past Compensation

Mr. Davis has been compensated close to the minimum MLB salary over his career.

<table>
<thead>
<tr>
<th>TABLE 3: Ike Davis’ Career Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salary</td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td>2010</td>
</tr>
<tr>
<td>2011</td>
</tr>
<tr>
<td>2012</td>
</tr>
</tbody>
</table>

v. Comparative Baseball Salaries of Equivalent Players

For the purposes of establishing Mr. Davis’ value to the Club, it is useful to compare his career and platform season performance with other MLB players of comparable age, position and statistics at the time of first time arbitration eligibility. The appropriate players with equivalent salaries include James Loney, Kendrys Morales and Jorge Cantu.

a. Ike Davis vs. James Loney

Mr. Loney was a first-time arbitration eligible player following the 2009 season and agreed to a one-year $3.1 million contract with the Los Angeles Dodgers.

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14 See Note 1
15 Id.
Similar to Mr. Davis, Mr. Loney was 25 years old when he became arbitration eligible. However, Mr. Loney had accrued 3.012 years of MLB service up to the 2010 off-season, compared to the 2.168 years of MLB service Ike Davis has accrued. Mr. Loney had 305 games played before his platform season, while Mr. Davis had only played 183 games.  

<table>
<thead>
<tr>
<th>TABLE 4: Ike Davis vs. James Loney</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ike Davis (First Baseman) - 25 Years Old</td>
</tr>
<tr>
<td>MLB Service: 2.168 years (01/2013)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>G</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>SO</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>A</th>
<th>E</th>
<th>FLD</th>
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<tbody>
<tr>
<td>Platform Rank</td>
<td>156</td>
<td>66</td>
<td>118</td>
<td>32</td>
<td>90</td>
<td>61</td>
<td>141</td>
<td>0.227</td>
<td>0.308</td>
<td>0.462</td>
<td>71</td>
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<tr>
<td>Career to Platform Rank</td>
<td>183</td>
<td>93</td>
<td>177</td>
<td>26</td>
<td>96</td>
<td>89</td>
<td>169</td>
<td>0.271</td>
<td>0.357</td>
<td>0.460</td>
<td>210</td>
<td>18</td>
</tr>
</tbody>
</table>

| James Loney (First Baseman) - 25 Years Old  |
| MLB Service: 3.012 years (01/2010) | Salary Midpoint: $3.100M |

<table>
<thead>
<tr>
<th>G</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>SO</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>A</th>
<th>E</th>
<th>FLD</th>
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</thead>
<tbody>
<tr>
<td>Platform Rank 20</td>
<td>158</td>
<td>73</td>
<td>163</td>
<td>13</td>
<td>90</td>
<td>70</td>
<td>68</td>
<td>0.281</td>
<td>0.357</td>
<td>0.399</td>
<td>85</td>
<td>7</td>
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<tr>
<td>Career to Platform Rank 21</td>
<td>305</td>
<td>127</td>
<td>315</td>
<td>32</td>
<td>175</td>
<td>81</td>
<td>143</td>
<td>0.303</td>
<td>0.353</td>
<td>0.480</td>
<td>197</td>
<td>23</td>
</tr>
</tbody>
</table>

Despite having different experience and fielding talent, Ike Davis and James Loney have produced parallel offensive numbers prior to their platform seasons. Mr. Loney’s OBP of 0.353 and SLG of 0.48021 are similar to Mr. Davis’ OBP of 0.357 and SLG of 0.460. However, there is a larger contrast between each player’s ability to make contact with pitches as Mr. Loney’s career to platform AVG of 0.30322 betters Mr. Davis’ career to platform AVG of 0.271.23

A key difference between Mr. Davis and Mr. Loney is the nature of their offense. Mr. Loney succeeds at getting on base while Mr. Davis excels at driving home runs. Mr. Loney’s offense is evidenced by his 163 hits ranking 13th, 0.281 AVG ranking 15th and 0.357 OBP.

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18 See Note 3
19 See Note 25
20 See Note 4
22 Id
23 See Note 3
ranking 18th among all MLB first basemen during his platform season. Conversely, Mr. Davis ranked 17th with 118 hits, 17th with a 0.227 AVG and 18th with a 0.308 OBP among in his platform season. However, Mr. Davis distinguished himself as a power-hitter with his 32 HR ranking 4th, 66 runs ranking 8th and 90 RBI ranking 8th among all MLB first basemen. Comparatively, Mr. Loney’s 73 runs, 90 RBI and 13 HR ranked 20th, 16th and 20th.

Defensively, neither player’s fielding was outstanding in their platform seasons or throughout their careers. Both players ranked 15th in assists (A) and 13th in FLD during their respective platform years, while Mr. Loney’s 7 errors (E) were 11th worst and Mr. Davis’ 8 were 5th. A major difference between the two players is Mr. Davis contributing 210 A over 183 games before his platform season, while Mr. Loney totaled 197 A in 305 games before his platform season. Despite being a product of chance and opportunity, the significant difference in assists demonstrates Mr. Davis’ ability to contribute to the Club’s fielding success. Mr. Davis and Mr. Loney have equal offensive production and similar defensive capabilities, which supports Mr. Davis’ case for comparable compensation to Mr. Loney’s $3.1 million salary.

b. Ike Davis vs. Kendrys Morales

Mr. Morales was a first-time arbitration eligible player following the 2011 season and agreed to a one-year $2.537 million contract with the Los Angeles Angels of Anaheim.

After the 2010 season, Mr. Morales had accrued 3.057 years of MLB service, which is almost a full-year more than Mr. Davis’ 2.168 years of MLB service accrued. Despite being two years older at time of arbitration, Mr. Morales had only played 96 games more than Mr. Davis.

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24 See Note 4
25 See Note 3
26 Id
27 See Note 17
28 See Note 4
29 Baseball Prospectus: Kendrys Morales Player Card: <http://www.baseballprospectus.com/card/card>
TABLE 5: Ike Davis vs. Kendry Morales  
Ike Davis (First Baseman) - 25 Years Old

<table>
<thead>
<tr>
<th>Platform</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
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<td></td>
<td>156</td>
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<td>118</td>
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<td>0.308</td>
<td>0.462</td>
<td>71</td>
<td>8</td>
<td>0.994</td>
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<tr>
<td>Rank</td>
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<td>8</td>
<td>17</td>
<td>4</td>
<td>8</td>
<td>9</td>
<td>5</td>
<td>17</td>
<td>19</td>
<td>12</td>
<td>15</td>
<td>5</td>
<td>13</td>
</tr>
<tr>
<td>Career to Platform</td>
<td>183</td>
<td>93</td>
<td>177</td>
<td>26</td>
<td>96</td>
<td>89</td>
<td>169</td>
<td>0.271</td>
<td>0.357</td>
<td>0.460</td>
<td>210</td>
<td>18</td>
<td>0.994</td>
</tr>
</tbody>
</table>

Kendry Morales (First Baseman and Rightfielder) - 27 Years Old

<table>
<thead>
<tr>
<th>Platform</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>SO</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>A</th>
<th>E</th>
<th>FLD</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>51</td>
<td>29</td>
<td>56</td>
<td>11</td>
<td>39</td>
<td>12</td>
<td>31</td>
<td>0.290</td>
<td>0.346</td>
<td>0.487</td>
<td>25</td>
<td>2</td>
<td>0.994</td>
</tr>
<tr>
<td>Rank</td>
<td>42</td>
<td>29</td>
<td>36</td>
<td>30</td>
<td>34</td>
<td>44</td>
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<td>24</td>
<td>12</td>
<td>35</td>
<td>35</td>
<td>13</td>
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<tr>
<td>Career to Platform</td>
<td>279</td>
<td>126</td>
<td>267</td>
<td>46</td>
<td>153</td>
<td>73</td>
<td>362</td>
<td>0.283</td>
<td>0.334</td>
<td>0.505</td>
<td>135</td>
<td>13</td>
<td>0.994</td>
</tr>
</tbody>
</table>

Mr. Morales is among the best MLB first basemen, which is demonstrated by his 5th place finish in AL MVP voting during the 2009 season. During that year, Mr. Morales ranked 9th in hits, 10th in HR, 7th in RBI, and 8th in SLG among all first basemen. Mr. Morales’ career to platform production slightly outpaced Mr. Davis’. Prior to 2010, Mr. Morales had an AVG of 0.283 and SLG of 0.505, which bettered Mr. Davis’ averages, while his 0.334 OBP trails Mr. Davis’ pre-arbitration OBP. Prior to arbitration, Mr. Morales hit one HR every 6.07 GP, and one RBI every 1.82 GP while Mr. Davis paced one HR every 7.03 GP and one RBI every 1.90 GP.

However, much like Mr. Davis, Mr. Morales’ career was hampered by a significant injury. On May 20, 2010 Mr. Morales fractured his tibia, which resulted in him missing the remaining 111 games of his platform season. Playing 51 games in 2010, Mr. Morales produced

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30 See Note 3  
31 See Note 29  
32 See Note 4  
33 Id.  
35 See Note 3  
36 See Note 34
an AVG of .290, 0.346 OBP and 0.487 SLG.\(^{37}\) Mr. Morales’ offensive production in his platform year placed him among the top 15 first basemen in key statistical categories, but his uncertain health drastically devalued his stock during the 2010 off-season. As a result, the $2.975 million contract Mr. Morales’ signed is lower than his projected production is worth. Nonetheless, Mr. Morales provides a fair comparable for the compensation value of Mr. Davis as both players had similar batting averages and offensive production in their careers and platform seasons.

**c. Ike Davis vs. Jorge Cantu**

Mr. Cantu was a first-time arbitration eligible player following the 2009 season and agreed to a one-year $3.5 million contract with the Florida Marlins.\(^{38}\)

Mr. Cantu was only a year older than Mr. Davis when becoming arbitration eligible and had accrued 3.119 years of MLB service. After the 2010 season Mr. Cantu had played 181 more games over 6 seasons, while Mr. Davis has showed more durability and reliability in 3 seasons.

<table>
<thead>
<tr>
<th>TABLE 6: Ike Davis vs. Jorge Cantu</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ike Davis (First Baseman) - 25 Years Old(^{39})</strong></td>
</tr>
<tr>
<td><strong>MLB Service: 2.168 years (01/2013)</strong></td>
</tr>
<tr>
<td><strong>G</strong></td>
</tr>
<tr>
<td>Platform</td>
</tr>
<tr>
<td>Rank</td>
</tr>
<tr>
<td>Career to Platform</td>
</tr>
</tbody>
</table>

| **Jorge Cantu (First and Third Basemen) - 27 Years Old\(^{40}\)** |
| **MLB Service: 3.119 years (01/2009)** | **Salary Midpoint: $3.5175M** |
| **G** | **R** | **H** | **HR** | **RBI** | **BB** | **SO** | **AVG** | **OBP** | **SLG** | **A** | **E** | **FLD** |
| Platform | 155 | 92 | 174 | 29 | 95 | 40 | 111 | 0.277 | 0.327 | 0.481 | 228 | 22 | 0.992 |
| Rank | 11 | 11 | 31 | 11 | 14 | 29 | 10 | 14 | 24 | 16 | N/A | N/A | 16 |
| Career to Platform | 394 | 205 | 347 | 33 | 185 | 118 | 124 | 0.269 | 0.339 | 0.413 | 354 | 35 | 0.995 |

\(^{37}\) Id.

\(^{38}\) Baseball Prospectus: Jorge Cantu Player Card: <http://www.baseballprospectus.com/card/card.php>

\(^{39}\) See Note 3

\(^{40}\) See Note 38

\(^{41}\) See Note 4
Despite having slightly more experience than Mr. Davis at the time of arbitration and playing only 66 games at first base during his platform season, Mr. Cantu provides a useful comparison given their similar offensive production. Prior to his platform season, Mr. Cantu had an AVG of 0.269, OPB of 0.339 and SLG of 0.413.\textsuperscript{42} Comparatively, Mr. Davis had an equal AVG but far better OBP and SLG before his platform season. Additionally, Mr. Davis’ created more offense than Mr. Cantu who totaled a comparable .520 runs and .469 RBI per game, but only averaged a HR every 11.939 GP compared to Mr. Davis’ rate of one HR every 7.038 GP.

Mr. Davis and Mr. Cantu had comparable performances in their platform season as they did prior to that year. Mr. Cantu’s AVG of .277, OBP of 0.327 and SLG of 0.481 were slightly better than Mr. Davis’ offensive averages. Additionally, Mr. Davis’ scoring production closely resembled Mr. Cantu’s 92 runs, 29 HRs and 95 RBIs.\textsuperscript{43} Defensively, Mr. Cantu posted a career FLD of .995 but struggled in his platform season with only a FLD of .992.\textsuperscript{44} Notwithstanding the greater experience of Mr. Cantu, the parallels in each player’s performance, particularly at the plate, make his contract of $3.5175 million an appropriate comparison for Mr. Davis’ salary.

\textbf{vi. Club’s Performance}

Mr. Davis’ tenure with the Mets has not produced much team success as the Club finished 4th in the NL East in the three seasons. Most recently, the Club compiled a 74-88 record in 2012, which was slightly worse than the Club’s poor performance in 2011 with a record of 77-85.\textsuperscript{45} However, Mr. Davis’ performance was among the Club’s best in 2012 ranking 1st in home-runs, 2nd in RBIs, 2nd in on-base percentage and 1st in slugging percentage.\textsuperscript{46} Had Mr. Davis not been on the Mets, the Club would have finished significantly worse. Additionally, Mr. Davis

\textsuperscript{43} See Note 3
\textsuperscript{44} See Note 42
\textsuperscript{45} MLB: Standings Page: <http://mlb.mlb.com/mlb/standings/index.jsp?tcid=mm_mlb_standings>
\textsuperscript{46} MLB: New York Mets Team Stats Page: <http://mlb.mlb.com/stats sortable.jsp?c_id=nym>
is one of the most beloved players on the Club, which was proven by the 2010 “I Like Ike” fan-favorite campaign.\textsuperscript{47}

Attendance-wise, the Club has suffered from its poor performance as numbers have declined over the past three seasons. Amongst NL clubs, the Mets ranked 8th in attendance in 2010, which decreased to 9th in 2011 and 11th in 2012.\textsuperscript{48}

3. Conclusion

The statistical analyses of Mr. Davis’ performance in his platform season and during his career, along with the player comparison of similar performers, provide support for Mr. Davis salary request. A fair and equitable contract offer from the Club would entitle Mr. Davis to $3 million for the 2013 season. Over the past three seasons, Mr. Davis has evolved from a top prospect and solidified himself as an elite first basemen, becoming one of the best power hitters in the MLB. Mr. Davis’ offensive production and defensive contributions have demonstrated his ability to be a top-performer in the Mets’ line-up, despite his young age. Mr. Davis’ youth should be viewed as an asset, rather than a liability, as he has demonstrated great upside and potential to become a franchise player for the Club. As such, it is appropriate that Mr. Davis receive a salary compensation award in excess of $2.7 million for the 2013 season.

\textsuperscript{48} ESPN: MLB Attendance Report: <http://espn.go.com/mlb/attendance>