**Table of Contents**

I. Introduction and Request for Hearing Decision in Favor of Tommy Hanson  
II. Player Performance Last Year  
III. Length and Consistency of Career Contributions  
IV. Past Compensation History  
V. Medical History  
VI. Recent Performance of the Club  
VII. Comparative Player Salaries  
VIII. Conclusion – A Finding in Favor of Tommy Hanson for $4.3 Million

**Table of Authorities**

1. BaseballProspectus, Prospectus Entertainment Ventures, LLC.
2. Baseball-Reference.com, Sports Reference, LLC,  
   Type='R'&sectionType=career&statType=2&season=2012&level='ALL
5. Major League Baseball (www.mlb.com)
6. MLB Collective Bargaining Agreement, “2012-2016 Basic Agreement”, Article VI(E)  
I. **Introduction and Request for Hearing Decision in Favor of Tommy Hanson**

This brief evaluates the talents, assets, and accomplishments of Tommy Hanson (“Mr. Hanson”), starting right-handed pitcher (“RHP”) for the Atlanta Braves of the National League (“NL”) that should reflect in his 2013 contract with the Atlanta Braves (“Braves”). 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. Any Player with a total of three or more years of Major League service, however accumulated, but with less than six years of Major League service, may submit the issue of the Player’s salary to final and binding arbitration without the consent of the Club.\(^1\) Under the 2012-2016 CBA Article VI(E) §(10)(a), the criteria to be considered in this arbitration hearing include: (1) the quality of player’s contribution to his 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 the player’s career contribution; (3) the record of player’s past compensation; (4) comparative baseball salaries; (5) the existence of any physical or mental defects of the player; and (6) the recent performance of the Club including but not limited to the Club’s league standing and attendance as an indication of public appeal.\(^2\)

Any evidence may be submitted which is relevant to the above criteria, and the weight assigned to the evidence by the arbitration panel is subjective, based on the facts and circumstances surrounding and involving each individual ball player. The arbitration panel shall, except for a Player with five or more years of MLB service, give particular attention, for

---


\(^2\) Id. at §10(a)
comparative salary purposes, to the contracts of Players with MLB service not exceeding one annual service group above the Player’s annual service group.³

Mr. Hanson has served 3.12 years in the MLB and is thus entitled to seek arbitration.⁴ The evidence presented in oral argument and this brief of Mr. Hanson’s superb athletic ability, intriguing past successes, and fascinating future potential demand that Mr. Hanson is entitled to receive his request of $4.3 million, rather than the $3.5 million offer from the Club. The Midpoint salary would be $3.9 million.

II. Player Performance Last Year

In the 2012 MLB season, Mr. Hanson went 13-10 in the win/loss column (W/L), a .565 winning percentage, with a 4.48 Earned Run Average (“ERA”) and giving up 1.454 walks plus hits per inning pitched (“WHIP”).⁵ The League average for wins was 3, while the ERA was 4.01. The League average for WHIP was 1.31. He started 31 games, and pitched a total of 174.2 innings, in essence, 5 2/3 innings per outing.⁶ He gave up 87 Earned Runs (“ERs”), 71 walks (“BBs”), 183 Hits (“Hs”), and 27 Homeruns (“HRs”), while striking out (“SOs”) 161 hitters and faced 761 batters (BFs).⁷ The league average for SOs in 2012 was 51.⁸ Mr. Hanson gave up 9.4 Hs per every 9 innings pitched, as well as 3.7 BBs per 9 innings. Also, his wins above replacement He did, however, average 8.3 SOs per 9 innings, and threw only 6 wild pitches.

³ Id.
⁵ Id.
⁶ Id.
⁷ Id.
⁸ http://sports.yahoo.com/mlb/players/7172
(WPs) though facing 761 hitters. The most impressive number is his 2.27 SOs per BB ratio, even though his wins above replacement (“WAR”) was a meager -0.5.

III. **Length and Consistency of Career Contributions**

Mr. Hanson is worth the requested $4.3 million because he is a 6’6”, 220 lbs, 26 year old monster of a pitcher, coming into the prime years of his career, with a low to mid 90s fastball, who also throws four other pitches: slider, curveball, two-seam fastball, and a changeup. The Braves let go of former-Atlanta legend Tom Glavine in 2009 in order to reserve a roster spot for the young prospect. Mr. Hanson, rewarded this newfound trust from the Braves by finishing third in the 2009 Rookie of the Year voting (For Full Stats, see Exhibit 1). Over the course of his short career, Mr. Hanson has a record of 45-32 in 108 games started (GS), with a 3.61 ERA, and a WHIP of 1.25. While giving up 68 HRs and 278 Rs during his career, he still has managed 592 SOs, to just 219 BBs, while leaving opposing batters hitting just .241 off of him. Even though Mr. Hanson's ERA has gradually risen each year of his short three-year career, his number of wins increase annually as well, making him ever more valuable to the Braves’ pitching rotation.

Mr. Hanson has many other stellar career statistics, including that he was in the top 20 in the NL in 2010, with an ERA of 3.33. Mr. Hanson was also 21st in the NL with 13 wins in
2012 and 25th with 161 SOs in the same year.\textsuperscript{17} In 2010, Mr. Hanson was 17th in the NL with 173 SOs, 17th with a 1.17 WHIP, and 14th in batting average against (“BAA”) at .239.\textsuperscript{18} Mr. Hanson also shows good durability by starting 34 games in 2010, which was 2nd in the NL, and 31 games in 2012, which was 23rd in the NL.\textsuperscript{19} As his wins have increased with every new season, so has the number of different pitches in his arsenal, currently sitting at 5. At 6’6”, 220, Mr. Hanson looks like a monster to batters while standing up on the hill, not to mention, he can make you look silly with any of his five pitches that he is able to throw during any count.

IV. \textbf{Past Compensation History}

Thomas J. Hanson was born on August 28, 1986 in Tulsa, Oklahoma. He went to high school and community college in California. He was then drafted by the Atlanta Braves in the 22\textsuperscript{nd} round of the 2005 amateur draft. Mr. Hanson signed with the Braves on May 24, 2006, and made his major league debut on June 7, 2009. In 2009, the year he was called up to the majors, he was still bound by his minor league contract and thus, it is not reflected in the following diagram. The following diagram is a breakdown of Mr. Hanson's salary during his three full seasons in the MLB:

<table>
<thead>
<tr>
<th>Year</th>
<th>Compensation</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>$435,000</td>
</tr>
<tr>
<td>2011</td>
<td>$456,500</td>
</tr>
<tr>
<td>2012</td>
<td>$535,000\textsuperscript{20}</td>
</tr>
</tbody>
</table>

\textsuperscript{17} \textit{Id.} \hfill \textsuperscript{18} \textit{Id.} \hfill \textsuperscript{19} \textit{Id.} \hfill \textsuperscript{20} Baseball-Reference
V. Medical History

Except for two different stints on the disabled list ("DL") in 2011, Mr. Hanson has been relatively healthy and has therefore remained a very viable, consistent option every turn threw the rotation. Below is a breakdown of his past MLB medical record:

2012: 17 days on the DL with lower back strain, as well as suffered a concussion due to a car accident during Spring Training.

2011: Two different times on the DL, first a 15 day stint due to shoulder tendinitis, and the second he missed 48 games due to a rotator cuff strain and tendinitis in his right throwing shoulder.

He missed no other time in 2009-2010.21

VI. Recent Performance of Club

The Atlanta Braves played relatively well last season, finishing with a record of 94-68, a .580 win pct.22 Sadly, they fell just 4 games short of the NL East crown. They did, however, manage to edge their way into a wild-card slot, marking the close of Chipper Jones’s legendary career.23

There were many bright spots to the Braves season, especially in their pitching staff. Thirty-seven year-old Tim Hudson finished last season with a 16-7 record and a 3.62 ERA, in 28 starts.24 Hudson also had 102 SOs, while giving up just 48 BBs. He is set to earn $9 million in 2013. Maholm went 4-5 with a 3.54 ERA in 11 games last year, with 59 SO and 19 BB, gave up

---

21 Baseball Prospectus
http://www.baseballprospectus.com/card/card.php?id=52080
22 Baseball-Reference
23 Id.
24 Id.
8 HR, and had a WHIP of 1.19. Malholm is set to earn $6.5 million in 2013. Kris Medlen was a major spark going 10-1 with a 1.57 ERA, while resting most of the year because he had just finished rehabbing his Tommy John Surgery from the year before. Unfortunately, Medlen was also charged with the wild-card loss to the Cardinals to end the season. The rotation for next season is projected to be: Tim Hudson, Chris Medlen, Tommy Hanson, Paul Maholm, Mike Minor, Julio Teheran, and possibly even a little bit of Jair Jurrjens sprinkled in the mix.

Turner Field was built in 1997 with dimensions of 335 ft. to left, 401 ft. to dead center, and 330 to right field. It is only slightly a pitcher’s park because it is relatively average in size for an MLB field. It currently ranks 18 of 31 on ParkFactors.com’s list of hitter-friendly parks, with Coors Field in Denver being number 1 most hitter-friendly, and Petco Park in San Diego being the least at number 31.

VII. Comparative Player Salaries

Tim Lincecum is a 28-year-old starting pitcher (“SP”) for the San Francisco Giants. He stands 5’11” and weighs 165 lbs., and in 2012 posted a record of 10-15, while pitching 186 innings during the course of 33 games. He gave up 23 HRs and had a 5.18 ERA and a 1.46 WHIP, with a WAR of -2.1. Lincecum did, however record 190 SOs, but walked 90 batters. With these stats, Mr. Lincecum is set to receive $22 million as compensation from the San Francisco Giants for the 2013 baseball season. Mr. Hanson is a much bigger man and a more imposing figure on top of the mound. He also had a better record last year than Lincecum, as

---

25 Id.
26 Id.
27 Id.
28 Baseball Prospectus
29 Id.
30 Id.
31 Id.
well as a much lower ERA. The WHIPs are somewhat close, but Lincecum’s WAR is more than four times worse than Mr. Hanson's. Nevertheless, Mr. Lincecum will receive $22 million next season while my client struggles to get $4.3 million.

Paul Maholm is a 30-year-old left-handed pitcher in the Atlanta Braves’ pitching rotation. He stands 6’2” and weighs 220 lbs. and last year posted a measly record of 4-5. He started 11 games for the Braves, pitched 68.2 innings, allowed 27 ERs, 8 HRs, and finished with an ERA of 3.54. He managed 59 SOs and 19 BBs, and had a 0.5 WAR. In recent years, Maholm’s record has been consistently abysmal, as he went 9-15 in 2010, 6-14 2011, and as aforementioned, 4-5 in 2012. He has a career winning percentage of .440, career ERA of 4.26, and a career WHIP of 1.379. Not to mention, during the 2011 season, he missed 40 games due to a shoulder strain in his throwing arm, the same injury faced by Hanson. In light of all these facts, the Atlanta Braves are willing to pay Mr. Maholm $6.5 million in 2013. Mr. Hanson's record of 13-10 is much better than Mr. Maholm’s. Even though Mr. Hanson's ERA maybe do a little higher, and his WAR a little lower, the records speak for themselves. Mr. Hanson's wins have steadily increased while Mr. Maholm, being four years older, struggles to find consistency. Yet the same Atlanta Braves that wish to offer Mr. Hanson $3.5 million is willing to pay a lesser achieving Maholm $6.5 million for next season.

Jair Jurrjens has been both a starting and relieving pitcher for the Atlanta Braves for the past five seasons. He alternates back and forth between the starting rotation and relief work

32 Baseball-Reference
33 Id.
34 Id.
35 Id.
36 Id.
37 Id.
38 ESPN.com
due to his vast inconsistencies and often times inability to control all of his pitches. \(^{39}\) Last year as a starter he tallied a record of 3-4 during 11 outings, an ERA of 6.89, a WHIP of 1.862, a WAR of -1.4, and only 19 SOs to 18 BBs. \(^{40}\) Jurrjens, despite these dismal numbers, was paid $5.5 million for his work, or lack thereof, in 2012 by the Atlanta Braves. \(^{41}\) Mr. Hanson, conversely, had a much lower ERA, much higher strikeout rate, in much lower WHIP, and a WAR that is nearly 3 times better than that of Jurrjens.

Dan Haren is a right-handed starting pitcher for the Washington Nationals, and will receive a salary of $13 million for this upcoming season. \(^{42}\) He is 6’5” and weighs 215 lbs. and is 32 years of age. In 2012, his record was 12-13 over the course of 30 games and 176.7 innings pitched. \(^{43}\) Haren gave up 190 hits, surrendered 85 ERs, as well as 28 HRs. He finished with 142 SOs, 38 BBs, and a 4.33 ERA. His WAR was .08. Haren missed 19 games last year. \(^{44}\) Mr. Hanson, being the bigger younger version of Mr. Haren, gave up fewer hits, less homeruns, pitched nearly the same amount of innings, and struck out 19 more hitters. Next year Mr. Harrell received $13 million, while Mr. Hanson must beg for $4.3 million.

Tim Hudson is a starting pitcher and the Ace on the Atlanta Braves pitching staff. However, he is 37 years old, and stands merely 6’1” and weighs 175 lbs. \(^{45}\) This 14 year veteran had a record of 16-7, with a 3.62 ERA last season during 28 games, over a period of 179 innings pitched. \(^{46}\) Mr. Hudson allowed 12 HRs and 72 ERs, while striking out hundred and two batters and walking 48. \(^{47}\) His WHIP was 1.2 and is WAR was 1.3. Next year, the Braves will pay this

---

\(^{39}\) Id.
\(^{40}\) Id.
\(^{41}\) Baseball-Reference
\(^{42}\) Id.
\(^{43}\) Id.
\(^{44}\) Id.
\(^{45}\) ESPN
\(^{46}\) Id.
\(^{47}\) Id.
37-year-old $9 million to had their pitching staff. In contrast, Mr. Hanson is not only 11 years younger, but is 5 inches taller and outweighs Mr. Hudson by 45 pounds. While having a better WHIP and a better WAR than Mr. Hanson, he only managed a meek 102 SOs, against Mr. Hanson’s 161. Clearly here we see the inevitable decline in the aging pitcher and the consistent rise by the improving youngster. (See Exhibit 2 for a full list of comparative stats).

---

48 Baseball-Reference
VIII. Conclusion

Mr. Hanson has shown consistency and durability throughout his young career. His mountainous size and wide variety of pitch types give him unusual physical advantages over the opposing hitters. His above-average number of strikeouts simply proves his dominance on the amount. Mr. Hanson is 26 years old, just entering the prime of his career, which some analysts would say doesn't happen for most pitchers until the age of 29. He already has 3.12 years of MLB experience, while consistently posting upper echelon statistics. He is a hot young pitcher with a bright future ahead of him. Based on the evidence given in this brief and presented in oral argument, Mr. Hanson respectfully requests that this panel grant his arbitration request for a $4.3 million salary for the 2013 season.