2013 National Baseball Arbitration Competition

Ike Davis v. New York Mets Baseball Club

Submission on Behalf of Ike Davis

Submitted by: Team 5
ARBITRATION ELIGIBILITY AND REQUEST FOR HEARING DECISION

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This brief is submitted on behalf of Mr. Ike Davis ("Davis"), first baseman ("1B") for the New York Mets (the "Club" or the "Mets"), regarding his salary for the 2013 Major League Baseball ("MLB") season. Under MLB’s current Collective Bargaining Agreement ("CBA"), a player becomes eligible to demand final and binding salary arbitration after accumulating three or more years of Major League service ("MLS") but not exceeding six years or by qualifying as a "Super Two" (a player who has accumulated at least 86 days of MLS during the immediately preceding season and who ranks in the top 22% in total MLS in the class of players who have at least two but less than three years of MLS).\(^1\) Having accumulated 2.168 years of MLS,\(^2\) Mr. Davis qualifies as a Super Two and respectfully requests that this panel award him a salary of $3.0 million ("M") for the upcoming season instead of the Club’s final offer of $2.4M.

Standards of Admissible Evidence:

To argue for Mr. Davis’ requested $3.0 M salary, this brief analyzes the statistics, attributes, accomplishments and overall quality of Mr. Davis’ platform season and career performance, addresses the recent performance of the Club, and uses statistics and salaries of similarly situated players as points of comparison. Such criteria are admissible under CBA Article VI (E)(10)(a).

Introduction:

At only 25 years of age, Mr. Davis has quickly distinguished himself as an elite-level home run ("HR") hitter, effective run producer, and imposing threat at the plate. Over his career, Davis has smashed 58 HR’s, batted-in 186 runs ("RBI"), and scored 159 times.\(^3\) He has smacked 2 walk-off and 17 tie-breaking HR’s\(^4\) and ranked 14\(^{th}\) in HR’s among all hitters (3\(^{rd}\) among 1B’s)\(^5\)

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in his platform year with 32 HR’s. Davis has also demonstrated plate discipline and consistency by walking (“BB”) 150 total times and batting .252 (“AVG”). With a .994 Fielding Percentage, a .461 cumulative Slugging Percentage (“SLG”), and a .797 On-Base Plus Slugging Percentage (“OPS”), Mr. Davis also combines defensive prowess with immense batting power.

ARGUMENT:

I. MR. DAVIS’ PERFORMANCE AND POWER POSITION HIM AS AN ELITE LEVEL RUN PRODUCER DESERVING OF HIS REQUESTED $3.0M SALARY.

Prior to Ike Davis’ MLB debut on April 19, 2010, the Mets struggled to a mediocre 4-8 record. Yet, after inserting Davis into the lineup, the Mets recorded a 10-1 performance in the Club’s next and Davis’ first 11 MLB games. Clearly helping the Mets to find direction and early success, Davis emerged as a premier hitter and a consistent and powerful offensive force. In his 147 games (“G”) in 2010, he smacked 19 HR’s, added 71 RBI’s, and scored 73 times, ranking him 3rd among MLB rookie hitters in each of those key offensive categories. With a .264 cumulative AVG, a .351 On-Base-Percentage (“OBP”) that ranked him 10th among MLB first basemen, and a .791 OPS that ranked him 12th among that same group, Davis demonstrated an ability to hit consistently, to place his team in a position to score runs, and to slug at power rates on par with MLB’s elite first basemen. That Davis displayed equally powerful and prolific statistics against both right-handed (.254 AVG, 16 HR, 52 RBI, .787 OPS in 402 At-Bats (“AB”)) and left-handed pitching (.295 AVG, 3 HR, 19 RBI, .805 OPS in 122 AB’s) marks him as a well-rounded and dominant offensive force.

On his way to a 7th place finish in the NL Rookie of the Year voting, Davis carried the Met offense throughout the 2010 season by providing consistent run production. Highlighting his

season with a game-winning HR against the Atlanta Braves, 2 multi-HR games, and 16 multi-RBI games, Davis proved a clutch run-producer who could position his team to win. As the Mets went 13-4 in games where Davis homered, Davis proved critical to the Club’s success. The table below shows Davis’ 2010 statistics and lists his ranks among 1B’s.

<table>
<thead>
<tr>
<th>Year</th>
<th>G</th>
<th>R</th>
<th>HR</th>
<th>RBI</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>AB/HR</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>147</td>
<td>73 (14th)</td>
<td>19 (19th)</td>
<td>71 (19th)</td>
<td>.264 (12th)</td>
<td>.351 (10th)</td>
<td>.440 (13th)</td>
<td>.791 (12th)</td>
<td>27.5 (16th)</td>
</tr>
</tbody>
</table>

Davis carried the momentum of his successful rookie year into 2011. In just 36 games, he clubbed 7 HR’s, scored 20 times, added 25 RBI’s, batted to a .302 AVG, and accumulated a .926 OPS. Yet, a collision on an infield pop-up with Mets third baseman David Wright on May 10 damaged the cartilage in Davis’ left fibula and cost him the remainder of the season. At the time, Davis averaged 1 HR every 18.4 AB’s (7th among 1B’s and a substantial improvement from his 2010 27.5 AB/HR rate), ranked 5th in HR’s and 6th in RBI’s among 1B’s, and seemed poised for an All-Star worthy-season with production and power rates that eclipsed his already notable rookie performance. That Davis climbed significantly higher in the rankings for each of the key power categories proves that Davis had developed into a dominating run producer. The table below lists Davis’ 2011 season statistics and rankings among 1B’s through May 10, 2011.

<table>
<thead>
<tr>
<th>Year</th>
<th>G</th>
<th>R (8th)</th>
<th>HR (5th)</th>
<th>RBI (6th)</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>AB/HR</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011</td>
<td>36</td>
<td>20</td>
<td>7</td>
<td>25</td>
<td>.302</td>
<td>.383</td>
<td>.543</td>
<td>.926</td>
<td>18.4</td>
</tr>
</tbody>
</table>

Due to the fact that Davis missed considerable time in 2011 because of his injury, he needed to show that he could at least sustain the superstar-level production that he flashed in 2011 in order to solidify himself as a consistent, powerful, and prolific run producer. In his platform

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season, Mr. Davis emphatically answered any lingering questions. His dominant performance dismissed his past injury, unquestionably established him as a premier slugging first baseman, and firmly placed him in the exclusive group of MVP (Most Valuable Player)-level hitters.

Playing in 156 games in his platform season, Davis proved injury-free. Statistically, Davis dwarfed his successful rookie year and outpaced the power rates that he posted in his brief but notable 2011 season. Davis blasted a superstar-worthy 32 HR’s and added a distinguished 90 RBI’s, ranking him 14th and 33rd among all MLB hitters and 3rd and 8th respectively among 1B’s. Davis averaged 1 HR every 16.2 AB’s (2nd among 1B’s; 9th among MLB hitters), posted 24 multi-RBI games, and highlighted his performance with 3 multi-HR games, including a game in which Davis hit 3 HR’s off pitcher Ian Kennedy who had finished 4th in the 2011 NL Cy Young Award voting. That the Mets played to an 18-10 record when Davis homered proves his pivotal role in the Club’s success, especially considering the Mets’ middling 74-88 overall record. Without Davis’ elite production, the Mets likely would have been mired in further mediocrity and lost even more games.

However, even those distinguished statistics and rankings do not fully attest to Davis’ elite level of performance in his platform season. From June 9 through the season’s end (roughly two-thirds of the 2012 season), Davis exploded for 27 of his HR’s, averaged 1 HR every 12.4 AB’s (1 HR every 3.7 Games), batted to a .265 AVG, and accumulated a .913 OPS, indicating his ability not only to slug but also to reach base and to put his team in scoring position. During that period, no other first baseman hit as many HR’s as Davis and only two MLB players hit as many HR’s with an equivalently high OPS: Miguel Cabrera, the 2012 American League MVP


\[14\] http://espn.go.com/mlb/stats/batting/_/position/1b/sort/atBatsPerHomeRun/type/sabermetric/order/false.

\[15\] http://www.baseball-reference.com/players/event_hr.cgi?id=davisik02&t=b.

\[16\] http://espn.go.com/mlb/player/gamelog/_/id/30532/ike-davis.
and Triple Crown winner, and Ryan Braun, the 2011 NL MVP winner and 2\textsuperscript{nd} place finisher in 2012.\textsuperscript{17} Davis’ powerful MVP-like performance solidified him as an elite level first baseman and superstar run-producer who belongs in the class of MLB’s best sluggers. The table below exhibits Davis’ platform year statistics and rankings among 1B’s and MLB position players.\textsuperscript{18}

<table>
<thead>
<tr>
<th>Year</th>
<th>G</th>
<th>R</th>
<th>HR</th>
<th>RBI</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>AB/HR</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>156</td>
<td>66</td>
<td>32 (3\textsuperscript{rd}) [14\textsuperscript{th}]</td>
<td>90 (8\textsuperscript{th}) [33\textsuperscript{rd}]</td>
<td>.227</td>
<td>.308</td>
<td>.462 (13\textsuperscript{th})</td>
<td>.771 (15\textsuperscript{th})</td>
<td>16.2 (2\textsuperscript{nd}) [9\textsuperscript{th}]</td>
</tr>
</tbody>
</table>

Now entering his first arbitration year with 58 career HR’s, 186 RBI’s, and a cumulative .797 OPS, Ike Davis deserves his $3.0M salary request that not only recognizes him as an elite level run producer but also compares equitably to that of other similarly situated power hitters.

II. ANALYSIS OF SIMILARLY SITUATED POWER-HITTING PLAYER STATISTICS AND SALARIES DEMANDS THAT THIS PANEL RECOGNIZE MR. DAVIS AS EQUALLY DOMINATING AND AWARD HIM A $3.0M SALARY FOR 2013.

A. IKE DAVIS V. KEVIN YOUKILIS:

Mr. Davis should be compared to power hitting position players who signed one-year contracts after reaching their first year of arbitration eligibility. First baseman Kevin Youkilis, who signed a one-year contract for $3.0M at that time, provides a strong basis for comparison. Because Youkilis earned that salary in the 2008 season, the true figure must be adjusted to its approximate 2012 value of $3.238M.\textsuperscript{19} Youkilis’ salary therefore exceeds Davis’ request and sets a high point for comparison. If Davis matches, approaches, or outperforms Youkilis, then he should be paid similarly to Youkilis and be awarded $3.0M for the 2013 season. The chart below compares both players’ platform and career statistics.

\textsuperscript{17} http://mlb.mlb.com/news/article.jsp?ymd=20121213&content_id=40635356&vkey=news_nym&c_id=nym.
\textsuperscript{18} Rankings among 1B’s are in parentheses; Rankings among all MLB players are in brackets. Sortable from http://espn.go.com/mlb/stats/batting/_/year/2012/; http://espn.go.com/mlb/stats/batting/_/year/2012/position/1b/order/false.
\textsuperscript{19} http://www.baseball-reference.com/players/y/youklke01.shtml. Salary conversion uses CPI data as on the site. All Youkilis statistics from baseball-reference except as otherwise noted.
As shown in bold, Davis matches, approaches, or outperforms Youkilis in the key power categories in both platform year and career production. Davis’ 32 platform season HR’s doubles Youkilis’ 2007 platform year output and almost matches Youkilis’ career to-date production. Davis added 7 more RBI’s in his platform season than Youkilis, and despite playing in 69 fewer career games, only fell 13 RBI’s short of Youkilis’ career total. That Davis boasts a higher platform season and career SLG percentage, approaches Youkilis’ OPS accumulation, and dwarfs Youkilis’ AB/HR rate, suggest Davis as the more powerful run-producer and more imposing threat at the plate. Despite the fact that Youkilis bests Davis in AVG and OBP, Youkilis never performed at an MVP level, as did Davis in his platform season with statistics that ranked him 14\textsuperscript{th} and 33\textsuperscript{rd} in HR’s and RBI’s respectively.\textsuperscript{20} Where Davis matches, approaches, and even outperforms Youkilis in the major power categories, he deserves recognition as the more elite, powerful, and dominant slugger and should be compensated similarly to Youkilis with his requested salary of $3.0M.

\textbf{B. IKE DAVIS V. KENDRYS MORALES:}

While analysis of Davis v. Youkilis proves convincing \textit{per se}, a look at other similarly situated players adds weight to Davis’ request. Where (1) Davis’ career statistics almost precisely mirror those of fellow first baseman Kendrys Morales’; (2) Davis significantly outperformed Morales in their respective platform seasons; and (3) Davis missed no time due to

\textsuperscript{20} 2012 HR Rank; 2012 RBI Rank.
injury in his platform season and Morales’ career-threatening injury during his platform year left questions as to his future ability, Davis not only compares to Morales as a dominant power hitter but also deserves a similar salary. Davis’ $3.0M request accounts for such similarities and aligns with the $2.975M one-year contract signed by Morales after his first arbitration-eligible season.\(^{21}\)

(1) Prior to becoming arbitration eligible, Morales played in 330 games, hit 57 HR’s, added 192 RBI’s, scored 155 Runs, averaged 1 HR every 19.93 AB’s and accumulated a .336 OBP. Those key power statistics prove strikingly similar to Davis’. In 339 games, Davis hit 58 HR’s (1 more than Morales), added 186 RBI’s (just 6 less than Morales), scored 159 Runs (4 more than Morales), averaged 1 HR every 20.19 AB’s (1 HR at only .26 more AB’s than Morales) and accumulated a .336 OBP (identical to Morales). Based on these markedly similar career numbers, Davis should earn a salary that mirrors Morales’. Since Davis’ $3.0M request closely resembles Morales’ $2.975M salary, this panel should award that request. The bold statistics below indicate where Davis equaled, approached, or outperformed Morales over their careers-to-date.

<table>
<thead>
<tr>
<th>Career</th>
<th>G</th>
<th>R</th>
<th>XBH</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>AB/HR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Davis</td>
<td>339</td>
<td>159</td>
<td>127</td>
<td>58</td>
<td>186</td>
<td>150</td>
<td>.252</td>
<td>.336</td>
<td>.461</td>
<td>.797</td>
<td>20.19</td>
</tr>
<tr>
<td>Morales</td>
<td>330</td>
<td>155</td>
<td>130</td>
<td>57</td>
<td>192</td>
<td>85</td>
<td>.284</td>
<td>.336</td>
<td>.502</td>
<td>.838</td>
<td>19.93</td>
</tr>
</tbody>
</table>

2) That Ike Davis significantly outperformed Morales in their respective platform years adds further weight to his request. Davis’ 32 HR’s and 90 RBI’s dwarf Morales’ 11 HR’s and 39 RBI’s; and Davis’ production of 27 of those HR’s and accumulation of a .913 OPS\(^{22}\) during the final two-thirds of his platform season placed him exclusively among MVP players, thoroughly eclipsing Morales’ level of output. Davis’ 2012 season therefore erases any doubt as to his recovery from injury, solidifies him as a dominant elite slugger, and indicates an upward career power and run-production trajectory. In contrast, Morales’ platform season was marred by a leg

\(^{21}\) http://www.baseball-reference.com/players/m/moralke01.shtml. Morales stats from here unless otherwise noted.

fracture that caused him to miss 111 games\textsuperscript{23} and produced serious questions regarding Morales’ potential effectiveness and ability to play in the future. Despite such disastrous results in his platform year, Morales still earned $2.975M after that season. Resultantly, as a minimum, Davis should earn a salary that matches Morales’, and since Davis’ $3.0M request parallels Morales’, this panel should grant Mr. Davis his request. The bolded statistics below show where Davis equaled, approached, or outperformed Morales in their respective platform seasons.

<table>
<thead>
<tr>
<th>Platform</th>
<th>G</th>
<th>R</th>
<th>XBH</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>AB/HR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Davis</td>
<td>156</td>
<td>66</td>
<td>58</td>
<td>32</td>
<td>90</td>
<td>61</td>
<td>.227</td>
<td>.308</td>
<td>.462</td>
<td>.770</td>
<td>16.4</td>
</tr>
<tr>
<td>Morales’10</td>
<td>51</td>
<td>29</td>
<td>16</td>
<td>11</td>
<td>39</td>
<td>12</td>
<td>.290</td>
<td>.346</td>
<td>.487</td>
<td>.833</td>
<td>17.5</td>
</tr>
</tbody>
</table>

3) Further, while both players produced one 30+ HR, 90+ RBI season, that one season proved to be Morales’ only full season, begging the question as to whether Morales was merely a “one season wonder.” As Morales’ major injury occurred during his platform year, he never had the opportunity to prove that he could overcome it and at least match his pre-injury production levels. However, Davis produced a rookie season of 146 games in which he ranked 3\textsuperscript{rd} among all rookies in HR, RBI, and R and a platform season of 156 games in which he ranked 14\textsuperscript{th} and 33\textsuperscript{rd} among all MLB hitters in HR’s and RBI’s respectively.\textsuperscript{24} Accordingly, he trumped Morales as the more consistent, productive, and elite run producer. Davis’ $3.0M request therefore seems not only warranted but also logical.

C. IKE DAVIS V. COLBY RASMUS:

Although not a first baseman, Colby Rasmus, a power-hitting member of the most recent class of first-year arbitration eligible players, offers an essential comparison. Because his $2.7M 2012 salary\textsuperscript{25} represents the midpoint between the Club’s $2.4M offer and Mr. Davis’ $3.0M

\textsuperscript{23} http://www.baseballprospectus.com/card/card.php?id=45379.
\textsuperscript{24} Rookie Ranks; 2012 1B HR Rank; 2012 1B RBI Rank.
\textsuperscript{25} http://www.baseball-reference.com/players/r/rasmuco01.shtml. All Rasmus stats from here unless otherwise noted.
request, in order to receive his salary request, Mr. Davis need only demonstrate that he slightly bested Rasmus’ performance level at the point that Rasmus received that salary.

As the bolded statistics below indicate, Davis not only reached Rasmus’ level, but also significantly surpassed his production in both platform season and career-to-date performance.

<table>
<thead>
<tr>
<th>Platform</th>
<th>G</th>
<th>R</th>
<th>XBH</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>AVG</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>AB/HR</th>
</tr>
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<tbody>
<tr>
<td>Davis</td>
<td>156</td>
<td>66</td>
<td>58</td>
<td>32</td>
<td>90</td>
<td>61</td>
<td>.227</td>
<td>.308</td>
<td>.462</td>
<td>.770</td>
<td>16.4</td>
</tr>
<tr>
<td>Rasmus’11</td>
<td>129</td>
<td>75</td>
<td>44</td>
<td>14</td>
<td>53</td>
<td>50</td>
<td>.225</td>
<td>.298</td>
<td>.391</td>
<td>.689</td>
<td>33.6</td>
</tr>
</tbody>
</table>

In their respective platform years, Davis demonstrated his rare power and elite run production by slugging 18 more HR’s, adding 37 more RBI’s, hitting 14 more extra base hits (“XBH”), eclipsing Rasmus in SLG by 71 points, averaging 1 HR in one-half of Rasmus’ AB’s, while also matching Rasmus in AVG and OBP. In his platform year, Rasmus never approached MVP winners in HR and OPS production as did Davis, and where Davis ranked 14th and 33rd overall in HR and RBI production, Rasmus ranked only 110th and 135th respectively in his. Even in his most notable season, Rasmus only ranked as high as 49th and 100th respectively in those same categories. Davis therefore proves the more productive, powerful, and distinguished slugger.

Comparison of their career productions yields the same conclusion. Despite playing in fewer games, Davis either matched or outperformed Rasmus in 8 out of the 10 key hitting categories shown above. As the more elite and dominant hitter and, at a minimum, Rasmus’ equal in consistency, hitting average, and on-base ability, Davis has more than evidenced his performance as more productive than Rasmus’. The only logical conclusion from this comparison points to a

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salary for Davis considerably greater than Rasmus’ $2.7M. As Rasmus’ salary figure represents the midpoint in this case, this panel must award Davis his requested $3.0M.

**CONCLUSION:**

The statistics, salaries, and attributes of power hitters indicate that such players are rare commodities that receive high salaries. That Ike Davis ranked among such players in power production and overall performance indicates that Mr. Davis should be similarly recognized with a similarly high salary. Where Kevin Youkilis established a salary high point at $3.238M, and Davis equals, approaches, or outperforms him in production, Davis deserves his requested $3.0M. As Davis clearly matched Kendrys Morales’ career production in XBH, R, HR, RBI, BB, OBP, and AB/HR ratio and definitively bested him in platform season output with an MVP-caliber performance, Davis should be compensated similarly to Morales’ $2.975M salary as a minimum. Moreover, that Davis’ elite platform year performance left no question as to his future productivity, power potential, or ability provides even more impetus for a ruling in Davis’ favor. Davis also significantly surpassed Colby Rasmus in HR’s, RBI’s, BB’s, AVG, OBP, SLG, OPS and AB/HR ratio in both platform year and career production. Reason follows that Davis should be paid substantially more than Rasmus and closer to Morales’ and Youkilis’ salaries. As Rasmus’ $2.7M salary represents the midpoint in the instant case and Davis need only to have proven that he matched Rasmus’ output in order to receive his salary request, Davis has more than met this burden of proof to command a salary greater than Rasmus’ $2.7M. Accordingly, Mr. Davis respectfully requests that this panel recognize him as a dominant run producer and elite power hitter and award him a $3.0M salary for the upcoming season.