2013 NATIONAL BASEBALL ARBITRATION COMPETITION

Ike Davis v. New York Mets (MLB)

SUBMISSION ON BEHALF OF IKE DAVIS

Submission by: Team 8
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I. Introduction and Request for Hearing Decision

This brief examines the playing career of Isaac Benjamin Davis (“Mr. Davis”), first baseman for the New York Mets (the “Club,” or the “Mets”), by examining statistics, awards, team attributes, player attributes, player salaries, and other relevant factors. The criterion considered in this arbitration is presented in the Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) between the MLB Players Association and MLB Clubs.\(^1\) Section VI(E)(10)(a) of the CBA outlines pertinent areas of MLB performance as including (1) the quality of Mr. Davis’ 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) comparative baseball salaries, (4) the existence of any physical or mental defects on the part of Mr. Davis, and (5) the recent performance record of the club, including, but not limited to, its Major League and National League (“NL”) standing and attendance as an indication of public acceptance.\(^2\)

The Club has made a final offer of $2.4M for Mr. Davis’ 2013 season, while Mr. Davis has offered $3M. Mr. Davis respectfully requests the arbitration panel to consider the following analysis and oral hearing to conclude that he is entitled to a 2013 salary arbitration award of $3M because his value is worth more than the midpoint of $2.7M.

II. Quality of the Player’s Contribution During the 2012 Season

The 25-year-old Davis boasted a very strong second half of the 2012 season after rehabilitating from Valley Fever that hindered his start to the campaign.\(^3\) In the Club’s final 102


\(^2\) Id. at § 10(a).

games, Davis hit at a .265 batting average (“BA”) and .347 on-base percentage (“OBP”) clip with 27 homeruns (“HR”) and 69 runs batted in (“RBI”). Projecting these numbers over a full season gives Davis “an elite-level 44 HR and 112 RBI.”

His .888 on-base percentage plus slugging percentage (“OPS”) after the all-star break led all NL first basemen, and his 20 HR “over the same period were fifth-best in baseball” behind only Miguel Cabrera (2012 American League MVP), Chase Headley, B.J. Upton, and Adrian Beltre. He finished the 2012 season ranking 5th in the NL with 32 HR and 3rd in the NL with 16.2 at bats (“AB”) per HR, and ranked in the Club’s top three producers in seven valued categories.

He also ranks better than the league average in two of three main categories for starting first basemen.

<table>
<thead>
<tr>
<th>Table 1: Ike Davis Stats (Club Rank)</th>
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<tr>
<td><strong>Year:</strong> 2012</td>
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<th>Table 2: Ike Davis v. 1B League Average</th>
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<td><strong>Year:</strong> 2012</td>
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<td><strong>Ike Davis</strong></td>
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<td>League Average</td>
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<th>Table 3: Ike Davis — 1B</th>
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<td><strong>Year</strong></td>
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<td>147</td>
</tr>
<tr>
<td>2011</td>
<td>36</td>
</tr>
<tr>
<td>2012</td>
<td>156</td>
</tr>
</tbody>
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5 Id.

6 Id. (a minimum 200 plate appearances were required) (among all eligible 1B, Davis placed second only to Buster Posey, the 2012 NL MVP, who started only 29 games at first base in 2012 compared to 114 at catcher [Buster Posey Stats, ESPN.COM, http://espn.go.com/mlb/player/stats/_/id/30112/type/fielding/buster-posey.]).

7 Id.


10 Ike Davis, YAHOO! SPORTS, http://sports.yahoo.com/mlb/players/8666;_ylt=Ag_HfSkgMeMXzkgApf6R0YWFCLeF; See Table 2.

Davis is a lineup anchor for a young,\textsuperscript{13} dynamic franchise and his statistics are indicative of a batter who shows consistent and improving power at the plate. Such attributes are exactly what managers look for in a starting first basemen. Furthermore, Mr. Davis’ 2012 second-half BA, HR, and RBI numbers predict continued success when he is fully healthy. According to Fangraphs analyst Colin Zarzycki, “there’s substantial evidence to point to a true talent level closer to his second half performance than his first two months [of 2012].” Zarzycki also pointed out that “it’s obvious” that Davis’ final numbers were “dragged down by him putting up well-below replacement level numbers early in the 2012 campaign,” likely due to his health.

As a rebuilding club that finished in the bottom half of all 2012 major league teams in R, BA, OBP, and SLG and 5th in record of six clubs in the NL East,\textsuperscript{14} the Mets need players like Davis who are young and provide consistent power to help the Club improve its competitiveness in the NL East. As such, Mr. Davis is justified in asking for $3M in arbitration as compensation and reward for the 2012 season, and for his anticipated contributions to the Club in the future.

\textbf{III. Length and Consistency of Career Contributions}

Mr. Davis has accrued 2.168 years of service time after being drafted by the Mets in the first round (18th overall) out of Arizona State University in the 2008 amateur draft.\textsuperscript{15} He is arbitration eligible for the first time after qualifying as a “Super Two” player as outlined in the CBA.\textsuperscript{16} Davis thrashed pitching in AA Binghamton to start 2009, hitting at a clip of .309 with

\begin{itemize}
  \item \textsuperscript{12} \textit{Ike Davis Statistics and History}, BASEBALL REFERENCE, http://www.baseball-reference.com/players/d/davisik02.shtml; Hits (“H”); Wins Above Replacement (“WAR”) (\textit{What is War, infra} note 21.).
  \item \textsuperscript{13} \textit{MLB Roster Analysis}, ESPN.COM, http://espn.go.com/mb/stats/rosters/_/sort/average_age/order/false (the Mets are the 5th youngest franchise with a 26.2 average age).
  \item \textsuperscript{15} Id.
  \item \textsuperscript{16} CBA, supra note 1 at §6(E)(1)(b).  
\end{itemize}
13 HRs, 30 runs, and 43 RBI in just 207 at bats.\textsuperscript{17} After only 33 at bats in AAA Buffalo, Davis was called up to the big league club in April of 2010.\textsuperscript{18}

Mr. Davis finished his 2010 rookie season with the Mets ranked seventh in the NL Rookie of the Year balloting.\textsuperscript{19} His 19 HR were tied for first among all MLB rookies, and his 71 RBI were third.\textsuperscript{20} Mr. Davis also finished 3rd among NL rookies with 3.5 wins above replacement.\textsuperscript{21} He also garnered the second-most GP, AB, R and BB in the NL rookie class with splits of 147/523/73/72, respectively, while showcasing an OBP of .351 and an OPS of .791.\textsuperscript{22}

Mr. Davis’ start to the 2011 season substantiates his value, including an impressive .302 BA, .383 OBP, and .925 OPS,\textsuperscript{23} though the season was eventually cut short due to injury. The Club may argue that Mr. Davis is not worth his offer of $3M because of the uncertainty regarding his health after a lingering ankle injury limited him to only 36 GP in 2011. This argument is less persuasive, however, considering Mr. Davis’ current health. Also, no evidence can be offered to substantiate a claim that Mr. Davis is injury-prone, as the 2011 ankle injury and 2012 illness were both irregular and isolated incidents.\textsuperscript{24} Based on the promise of a bright future for Mr. Davis as the Mets’ starting first basemen through his success in 2012, his requested salary of $3M is reasonable and is on par with first basemen boasting similar numbers.

**IV. Comparative Baseball Salaries**

When comparing Mr. Davis’ performance throughout the beginning of his career to other players of similar caliber and in the same or similar annual service group, it is clear that he is

\textsuperscript{18} Id.
\textsuperscript{20} Id.
\textsuperscript{21} Id.; “What is War,” FANGRAPHS, http://www.fangraphs.com/library/index.php/misc/war/ (WAR calculates the number of wins the player added to the team above what a replacement player would add).
\textsuperscript{22} NL ROY Voting, supra note 18.
\textsuperscript{23} Ike Davis Statistics and History, supra note 12.
\textsuperscript{24} Guilfoyle, supra note 17.
deserving of the $3M requested in arbitration. The CBA lays out the guidelines for what criteria to weigh when determining an award, including the salaries of such comparable players.25 This section will discuss the contributions of, and compensations for, players of similar caliber that are arbitration eligible at the same time as Mr. Davis.

<table>
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<tr>
<th>Player</th>
<th>Year</th>
<th>GP</th>
<th>H</th>
<th>R</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>K</th>
<th>BA</th>
<th>OBP</th>
<th>SLG</th>
<th>OPS</th>
<th>WAR</th>
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<tr>
<td>Ike Davis</td>
<td>2012</td>
<td>156</td>
<td>118</td>
<td>66</td>
<td>32</td>
<td>90</td>
<td>61</td>
<td>141</td>
<td>.227</td>
<td>.308</td>
<td>.462</td>
<td>.771</td>
<td>1.5</td>
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<tr>
<td>Carlos Pena</td>
<td>2004</td>
<td>142</td>
<td>116</td>
<td>89</td>
<td>27</td>
<td>82</td>
<td>70</td>
<td>146</td>
<td>.241</td>
<td>.338</td>
<td>.472</td>
<td>.810</td>
<td>2.0</td>
</tr>
</tbody>
</table>

Carlos Pena, currently the starting first baseman for the Houston Astros, agreed at age 27 with the Detroit Tigers to a one-year deal of $2.575M for the 2005 season, as the result of an impressive 2004 season.27 Pena finished his 2004 campaign with 27 HR, 82 RBI, 89 R, and a .241 BA in 142 GP.28 Pena finished his arbitration platform season eligible as a “Super Two,” similar to Davis. While he did boast a slightly higher BA and WAR than Davis, Mr. Davis’ power statistics illustrate that the players achieved similar success in their platform years, perhaps with even a slight edge in power to Mr. Davis.

Though the run totals appear to substantially favor Pena over Davis, two factors should be considered that might slightly adjust for this difference. First, a minor adjustment can be considered for the “Park Factor,” where Comerica Park in Detroit in 2004 was slightly more of a hitter’s park (.923) than Citi Field in New York (.874) in 2012.29 Furthermore, Pena’s 2004 Tiger lineup consisted of eight players that produced at a .264 BA or better,30 while only three

25 CBA, supra, note 1.
27 Carlos Pena Season Stats, supra note 25.
28 Id.
players for the 2012 Mets produced at this clip or above. In fact, the 2004 Tigers featured three players at or above .318 and the club scored a total of 827 runs on the season,32 while David Wright was the only member of the 2012 Mets to surpass the .300 mark, leading the Mets to 650 total runs.33 Though both teams finished with similar records, the 2012 Mets anemic offense was a substantial disadvantage to Davis in runs scored, which is significantly impacted by a good supporting cast offensively. Alternatively, homeruns and strikeouts are more controllable individual player statistics, and Davis maintained an advantage over Pena in both.

Mr. Davis’ performance was at least worth Pena’s plateau year, in which Pena received $2.575M (equivalent to over $3M in 2012), and Davis’ youth by two years should also factor as exhibiting even more potential for his success in the future. Accordingly, Mr. Davis is worth at least the midpoint of $2.7M; therefore, his offer of $3M is justifiable and well deserved.

A slightly more recent comparison for Mr. Davis is Justin Morneau, the Minnesota Twins first baseman who received a $4.5M arbitration contract for the 2007 season.35 Morneau’s “Super Two” eligible numbers are comparable in GP and HR to those of Davis, however Morneau earned the AL MVP with his platform year after impressive numbers in hits, R, RBI, BA, and WAR. See Table 5.

Though these numbers appear to have a sizeable gap, it is important to factor in Mr.

| Table 534 Player Comparison – v. Justin Morneau |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Player | Year | GP | H | R | HR | RBI | BB | K | BA | OBP | SLG | OPS | WAR |
| Ike Davis | 2012 | 156 | 118 | 66 | 32 | 90 | 61 | 141 | .227 | .308 | .462 | .771 | 1.5 |
| Justin Morneau | 2006 | 157 | 190 | 97 | 34 | 130 | 53 | 93 | .321 | .375 | .559 | .934 | 4.0 |

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32 2004 Detroit Tigers, supra note 30.  
33 2012 New York Mets, supra note 31 (Wright finished 2012 as the Mets only offensive all-star, batting .306. The second highest BA on the club was Daniel Murphy, who batted .291 in 2012).  
Davis’ illness and its impact on his start to the season. As Zarzycki stated, Mr. Davis’ true value is likely better seen by his numbers in the final 102 games of 2012, after he had somewhat recovered from the Valley Fever illness that plagued him from the start of his campaign.³⁶ With these projections and Davis’ actual performance after the all-star break, where he led the league in OPS and was 5th in all of baseball in homeruns,³⁷ Davis and Morneau appear quite similar in their platform performances. It is worthwhile to note that Morneau, like Pena, played in slightly more of a hitters park as well, as the “Park Factor” reveals that Mall of America Field in Minneapolis allowed more runs in 2006 (.963) than Citi Field did in 2012 (.874).³⁸ It is also useful to compare the two players, both ages 25 during their platform seasons, in their previous seasons played, as their trajectories appear similar from their first 2+ seasons. Though both were injured for substantial parts of one of their first two seasons, their numbers overall through their first two seasons are nearly identical. See Table 6.

<table>
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<th>H</th>
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<td>2010</td>
<td>147</td>
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<td>72</td>
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<td>.264</td>
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<td>Justin Morneau</td>
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<td>74</td>
<td>76</td>
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<td>19</td>
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<td>36</td>
<td>39</td>
<td>20</td>
<td>7</td>
<td>25</td>
<td>17</td>
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<td>.302</td>
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<tr>
<td>Justin Morneau</td>
<td>2005</td>
<td>141</td>
<td>117</td>
<td>62</td>
<td>22</td>
<td>79</td>
<td>44</td>
<td>94</td>
<td>.239</td>
<td>.304</td>
<td>.437</td>
<td>.741</td>
<td>1.6</td>
</tr>
</tbody>
</table>

Finally, it must be conceded that Morneau did in fact win the 2006 AL MVP with his performance, a feat often rewarded in arbitration.⁴⁰ Morneau’s accepted arbitration offer, however, was for $4.5M, which is valued at over $5M in today’s earnings. Mr. Davis is not seeking to be compensated like a former MVP. If the panel considers Mr. Davis’ production is valued as even two-thirds of Morneau’s value, which the statistics show it is, the panel should

³⁶ Zarzycki, supra note 4.
³⁷ Id.
³⁹ Ike Davis Season Stats, supra note 25; Justin Morneau Season Stats, supra note 35.
⁴⁰ Justin Morneau Statistics and History, supra note 34; CBA, supra note 1.
find the value as above the midpoint of $2.7M and, thus, in favor of Mr. Davis’ offer of $3M.

V. Existence of Physical or Mental Defects

Mr. Davis has no applicable physical or mental defects that should be considered in awarding his final offer of $3M in arbitration. As discussed previously, the ankle injury he experienced in 2011 and the Valley Fever illness in 2012 were both irregular and unrelated health issues that no longer are affecting Mr. Davis. This can be seen both by his “elite” production once he had fully recovered in the final 102 games of the 2012 season, as well as in his current condition. Mr. Davis’ ankle is healthy, and he had a full checkup on his lungs that proved everything healed from his illness. There is no evidence offered to suggest Mr. Davis is or has ever been injury-prone. In fact, it has been suggested that perhaps the left ankle sprain “might have been misdiagnosed a few times by the Met’s [sic] medical staff.” Taking into consideration the impressive numbers he produced in the final 102 games of the 2012 season, there can be little sincere discussion that Mr. Davis has not fully recovered from both incidents.

The Club might present an argument relating to unsubstantiated claims regarding Mr. Davis’ coachability and personal life away from the baseball field. In September 2012, rumors circulated that Davis might be traded because he was unwilling “to make changes based on coaching advice” and that he was “out too late after games.” Mr. Davis was quick to dispel the accusations regarding his personal life, stating he “show[s] up every day” to “play hard.”

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41 Zarzycki, supra note 4.
42 Brennan, supra note 3.
43 Guilfoyle, supra note 17.
Mets later squashed any trade conversation, which led to skepticism regarding the coachability rumor as well. “Adding Davis’ social life as a negative on top of a supposed lack of coachability suggests a hint of personality clash and the chance that this rumor is entirely the result of one source’s personal desire for change.” Thus, Davis is free from both physical and mental defect. His offer of $3M is deserved and should not be diminished for any physical or mental reason.

VI. Recent Performance of the Club and Public Appeal

The New York Mets have not made the post-season during Mr. Davis’ tenure and have finished with a winning percentage between .457 and .488 the past three seasons. In order to contend for the post-season and beyond, the Club needs a core of dynamic, productive young players with the potential to help the team grow. With Davis’ extremely high potential and probability of building off his second-half numbers and improving his stats, he will play a very important role in helping the Mets become perennial post-season contenders. The Club has dropped from an average attendance of over 32,000 fans in 2010 (ranking 12th in all of baseball) to just over 28,000 in 2012 (ranking 17th). In demonstrating to fans that they are committed to replicating the Club’s rich history by developing and building on young talent, such as Davis, the Club’s executives will be able rebuild the Mets fan base in the largest media market in the U.S. and ultimately raise attendance.

In addition, it is Mr. Davis’ public appeal to the Mets fan base that provides added value to him as a professional athlete in New York. Davis “became the fan favorite of the Mets in what has to be record time;” only “five days after his Major League debut, Ike Davis had already

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become a folk hero.”

Davis’ strong start after being called up earlier than expected, including two multi-hit games and the longest homerun ever hit at Citi Field all within his first five games, sparked the Club’s fans to purchase “I Like Ike” t-shirts and memorabilia in bunches. Davis has proven not just to be a statistical producer and beloved fan favorite, but also a “subject of fascination” as a high-profile Jewish athlete in New York, where there are “many Jewish baseball fans.” He has demonstrated that he is a philanthropist, donating all proceeds of the “I Like Ike” apparel to Ewing’s Sarcoma research, and recently received the Thurman Munson Award honoring “success on the fields of play and philanthropic works off the field.”

Davis has proven to not only benefit the Club’s success on the field, but also as a positive philanthropic leader with public appeal that Mets fans can support and relate to.

VII. Conclusion

Ike Davis has emerged as one of the brightest young players at first base in MLB. His performance and high potential make him a key component to the future success of the Mets organization. He is an anchor for the young Mets both on the field as the cleanup hitter and away from the field as an exemplary philanthropist and cultural folk hero to the Mets fan base. His statistics suggest that he will continue to improve on his impressive performance through only 2.168 years of service. In consideration of the CBA criteria analyzed in this brief, Mr. Davis respectfully asks the arbitration panel to decide in his favor and award a 2013 salary of $3M.

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52 Id.
53 Id.