2013 NATIONAL BASEBALL ARBITRATION COMPETITION
IKE DAVIS V. NEW YORK METS (MLB)
SUBMISSION ON BEHALF OF THE PLAYER
IKE DAVIS
Player Request: $3.00 Million
Club Offer: $2.40 Million
Midpoint: $2.70 Million
Submitted by: Team 21
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Cots Baseball Contracts (Baseball Prospectus),
http://www.baseballprospectus.com/compensation/cots/
The Official Website of Major League Baseball, www.MLB.com
I. INTRODUCTION TO THE ARBITRATION HEARING BETWEEN THE NEW YORK METS AND IKE DAVIS, FIRST BASEMAN.

This brief analyzes the statistics, attributes, salaries, comparative salaries, and additional factors regarding the playing career of Ike Davis (the “Player” or “Davis”), first baseman for the New York Mets (the “Club” or “Mets”) in order to settle salary differences for the upcoming 2013 season. The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) between the Major League Baseball Players Association (“MLBPA”) and the thirty MLB Clubs lays out guidelines for an arbitration hearing.

The Mets selected Davis in the first round (18th overall) of the 2008 Amateur Draft; he made his Major League debut on April 19, 2010 against the Chicago Cubs. Davis is a first-baseman who is first time arbitration eligible for the upcoming 2013 season as a “Super Two. A “Super Two” player does not have the general requirement of three or more years of Major League Service (MLS) time but has two years of service, has accumulated at least 86 days of service during the immediately preceding season and ranks in the top 22 percent in total service in the class of players who have at least two but less than three years of Major League service, however accumulated, but with at least 86 days of service accumulated during the immediately preceding season. Davis meets the above criteria by accumulating 2.168 years of service, over 86 days of service in the 2012 season and ranking in the top 22 percent his service class.

The Player respectfully requests that the arbitration committee consider the evidence contained in this brief and oral argument in finding that a salary award of $3.0 million is the appropriate compensation for Davis the 2013 MLB season.

1 http://mlb.mlb.com/pa/info/faq.jsp#arbitration.
II. REQUEST FOR A HEARING DECISION IN FAVOR OF THE PLAYER.

The criteria for the arbitration hearing between Davis and the Mets is set by the 2012-2016 Collective Bargaining Agreement (“CBA”) between the Clubs and MLBPA. Under Section VI, Part E(10)(a)-(b) of the CBA, certain areas of Davis’ MLB time are considered for purposes of this hearing:

(1 hereafter “A”) the quality of Fowler’s contribution to the Rockies during the past season (i.e., platform year), including, but not limited to, his overall performance, special qualities of leadership, and public appeal; (2 hereafter “B”) the length and consistency of his career contributions; (3) his past recorded compensation figures; (4 hereafter “C”) comparative baseball salaries; (5) the existence of any mental or physical defects; and (6) the recent performance record of the Club, including its League standing and attendance.\(^3\)

Ike Davis has blossomed into an essential piece of the Mets franchise through his immense power, dependable fielding and future potential. These factors determined the Player’s offer of $3.0 million, which places him in line with prior comparable arbitration-eligible players.

A. Quality of Ike Davis’ Contribution during the Past Season

| Figure 1 – Ike Davis Platform Year Batting Statistics\(^4\) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | Age | G | PA | R | H | 2B | HR | RBI | BB | SO | BA | OBP | SLG |
| 2012 | 25 | 156 | 530 | 66 | 118 | 26 | 32 | 90 | 61 | 141 | 0.227 | 0.308 | 0.462 |

In his 2012 season, Davis provided most of the power in an anemic Mets’ line up that ranked twenty-second in home runs among the MLB.\(^5\) His team high 32 home runs led not only the Mets but ranked him second among first basemen in the National League (NL), fourth among all MLB first basemen and fourteenth among all MLB players. With these 32 home runs, Davis became the first Met to hit over 30 home runs since 2008.

But Davis was more than just a home run hitter in 2012. Davis was also eighth among all NL first basemen in doubles with 26 and his slugging percentage (SLG) was above average for

\(^5\) http://mlb.mlb.com/stats sortable.jsp.
NL and MLB first baseman and for all MLB and NL players. Furthermore, Davis drew 61 walks and drove in 90 runs as the Mets’ cleanup hitter for the majority of the season.

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<thead>
<tr>
<th>Figure 2 – Ike Davis Platform Season Splits</th>
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<tr>
<td><strong>Split</strong></td>
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<tr>
<td>April - May</td>
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<td>June - October</td>
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<td>June - Oct (Adjusted to 162 games)</td>
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</table>

Davis’ impressive power statistics came despite a very slow start to the season. Through the first two months of 2012 Davis did not hit to his ability, hitting for only a .158 batting average with just 5 home runs in 171 plate appearances. (See Figure 2) But for the rest of the season Davis took off in a big way, hitting 27 home runs in only 413 plate appearances with a much improved .253 batting average while matching his strikeout total from the previous two months in more than double the games played and plate appearances. If these stats for Davis’ final four months of the season were normalized over a full 162 game season, Davis would have had an incredible 41 home runs while only striking out 74 times. This adjusted home run total would have ranked Davis first in both the National League and among all MLB first baseman and fifth among all MLB players.

Obviously, this slow start must be accounted for in determining Davis’ arbitration award. But Davis’ slow start should be partially excused due to his battle with Valley Fever throughout spring training and the first two months of the season. Valley Fever is a lung illness contracted by the inhalation of a certain type of spore commonly found in Arizona, where Davis makes his offseason home. But this illness is a non-baseball injury that generally does not carry any long-term effects that would hinder a baseball player’s ability. While the only other documented case

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6 Id.
8 Id.
of Valley Fever in recorded MLB history, former Diamondbacks’ first baseman Conor Jackson, never truly recovered to his previous level of performance, Davis’ remarkable turnaround once he recovered from his illness should allay any concerns of any long-term physical defects.\(^{10}\)

Defensively, Davis has been very durable and consistent. In the 2012 season, Davis played in 156 defensive games as the Mets’ first basemen, ranking him fourth among all MLB first basemen. Furthermore, his fielding percentage of .994 was higher than that of the league average for first basemen of .992 showing his proficiency to play a strong defensive first base free of the errors that often plague other power hitters that clubs try to “hide” at first base.\(^{11}\)

In conclusion, Davis’ power numbers and defensive durability in his platform season justify a salary of $3.0 million for the 2013 season.

### B. Length and Consistency of Ike Davis’ Career Contributions

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<tr>
<th>Year</th>
<th>Age</th>
<th>G</th>
<th>PA</th>
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<th>HR</th>
<th>RBI</th>
<th>BB</th>
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<th>BA</th>
<th>OPS</th>
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</thead>
<tbody>
<tr>
<td>2010</td>
<td>23</td>
<td>147</td>
<td>601</td>
<td>523</td>
<td>73</td>
<td>138</td>
<td>33</td>
<td>1</td>
<td>19</td>
<td>71</td>
<td>72</td>
<td>138</td>
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<tr>
<td>2011</td>
<td>24</td>
<td>36</td>
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<td>129</td>
<td>20</td>
<td>39</td>
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<td>31</td>
<td>.302</td>
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<tr>
<td>2012</td>
<td>25</td>
<td>156</td>
<td>584</td>
<td>519</td>
<td>66</td>
<td>118</td>
<td>26</td>
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<td>32</td>
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<td>5 Yrs</td>
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<td>339</td>
<td>1334</td>
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<td>159</td>
<td>295</td>
<td>67</td>
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<td>58</td>
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<tr>
<td>162 Game Avg.</td>
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<td>162</td>
<td>637</td>
<td>560</td>
<td>76</td>
<td>141</td>
<td>32</td>
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<td>89</td>
<td>72</td>
<td>148</td>
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Along with his platform season, Davis’ numbers have been very impressive throughout his career when he has been able to stay on the field. (See Figure 3) After posting strong numbers his rookie season of 2010 to earn him seventh place in NL Rookie of the Year voting, Davis started strong in 2011, he sported a highly impressive .925 OPS along with seven home runs and twenty-five RBI’s. This season was cut short due to an ankle injury but in 2012, he showed no ill effects and had his best power numbers to date with 32 home runs and 90 RBI’s.\(^{13}\)


\(^{11}\) [http://mlb.mlb.com/stats/sortable.jsp](http://mlb.mlb.com/stats/sortable.jsp).


\(^{13}\) Id.
Having a left-handed power bat in the line-up is essential for any baseball team and Ike Davis fits that mold. Despite missing time to injury Davis has averaged just under 20 home runs per year with a strong on-base percentage. With these numbers he has shown himself to be a considerable force in the Mets’ batting order and an anchor to a lineup that has struggled greatly in recent years.

It is fairly common for power hitters in MLB to have low averages and a large number of strikeouts. If you compare Davis to contact hitters his .252 career batting average seems somewhat anemic but when compared to other power hitters Davis’ batting average measures up quite well. For example, Adam Dunn, who led all first basemen with 41 home runs in 2012, had a batting average of only .204. Teams pay power hitters for their ability to hit home runs, not hit singles. While a high batting average is always desirable in any hitter, it is far less important for a power hitter who has the ability to drive the ball as well as Davis can.

It is noted that while Davis has missed significant time due to injuries over the past two years, he should be not considered an injury prone player. Both injuries happened by fluke and not due to the normal wear and tear caused by playing baseball for a living. For example, in 2011, Davis missed significant time due to an ankle injury, but this injury was caused only because of a nasty collision with Mets’ third baseman David Wright. Davis has fully recovered from this injury and demonstrated this by his performance. Similarly, in 2012 Davis’s battle with Valley Fever was a non-baseball injury and Davis has correspondingly made a full recovery. In fact, Davis’ strong second half to his platform year should serve to show that Davis is the type of player that the club can count on to bounce back strongly from injury to quickly play to his full potential. Regardless, this strong finish shows that he is free from any current physical defects

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14 *Id.*
Defensively, Davis began his career with a bang making three unbelievable catches over the dugout rail at Citi Field. Davis not only started in 141 of the Mets 162 games his rookie season, but he has also displayed a consistent fielding percentage ever since.\(^\text{16}\) In his three years, Davis has never had a fielding percentage below .993.\(^\text{17}\) Due mostly to his defensive skills Davis beat out fellow Met first baseman Lucas Duda and was awarded the first base position.

Davis’ youth, potential, tremendous power, and defensive consistency make a salary of $3.0 million reasonable.

C. The Comparative Baseball Salaries of Dexter Fowler to his Service Class and Prior Arbitration Eligible Players

1. James Loney - $3.1 million

<table>
<thead>
<tr>
<th>Year</th>
<th>Age</th>
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<th>PA</th>
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<th>2B</th>
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<td>Career Totals</td>
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<td>1334</td>
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<td>James Loney(^\text{19})</td>
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<td>Platform</td>
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<td>652</td>
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<td>.295</td>
<td>.354</td>
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James Loney ("Loney") formerly of the Los Angeles ("Dodgers") was first time arbitration eligible following the 2009 season.\(^\text{20}\) Loney’s platform year performance landed him a $3.1 million dollar contract from the Dodgers to avoid arbitration.\(^\text{21}\) When comparing Loney and Davis, the contrasts in power numbers are immediately apparent. Loney hit a meager 13 home runs compared to Davis’ 32. In addition to the outstanding home run total, Davis also

\(^{17}\) Id.
\(^{20}\) Id.
surpassed Loney in slugging percentage (SLG) and on-base plus slugging percentage (OPS) by impressive margins. However, Loney did have a significant contribution to his club. In his platform season, Loney maintained a solid .281 batting average and drove in 90 runs, topping Davis in BA and equaling his platform year RBI totals.  

Throughout his career, Loney has been a solid hitter. In 2007, Loney only played in 96 games but maintained a solid batting average of .331 and hit 15 home runs. In 2008, despite playing in 161 games Loney’s home run total decreased to 13 but he did have an impressive 90 RBI’s. In his career leading up to his first year of arbitration Loney was able to drive in runs and get on base, giving him significant value. But while there are many players playing in the major leagues that can maintain a solid BA and RBI total, Davis’ value stems from his considerable home run and run production potential. Furthermore, Davis has been one of the Mets’ bright spots this season.

In many ways Davis and Loney had similar seasons leading up to arbitration even though they showed it in different categories. Davis has been a consistent power threat while Loney has been able to accumulate hits and maintain a solid average. While Davis’ power numbers suggest a higher salary than Loney, Loney is rewarded for his ability to stay on the field. This justifies the Player’s offer of $3.0 million, a salary just under what Loney received for the 2010 season.

2. **Delmon Young - $2.6 million**

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<th>Year</th>
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<td><strong>Ike Davis</strong></td>
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22. Id.
24. Id.
Delmon Young ("Young") formerly of the Minnesota Twins ("Twins") was first time arbitration-eligible following the 2009 season. Based on his performance through the 2009 season, Young received a one year $2.8 million contract to avoid arbitration, which is a number just below the midpoint of $2.7 million in this arbitration hearing.27 Similarly to Loney, Young represents a player who was supposed to develop into a consistent middle-of-the-order threat but never developed the power necessary for that role.

Young and Davis began their careers in very similar ways. Both were first round picks drafted with the expectation that they would anchor their respective teams’ batting order for years to come. Both had strong rookie seasons that placed them within the top-10 in rookie of the year voting in their respective leagues.

However, while Davis has bounced back from injuries to become the very home run threat the Mets were expecting him to become, Young had not yet shown that potential by his first year of arbitration. Despite playing in over 100 more games, Young hit 20 fewer home runs than Davis with a lower on base percentage and slugging percentage. Young also had shown far less patience than Davis, drawing less than half as many walks in 500 more plate appearances.28

But the starkest difference between the two players comes in their respective platform seasons. While Davis showed his power potential with an incredible finish to the season and finished with 32 home runs, Young only hit 12 home runs and struggled the entire year.29 In this platform year Young put up his worst doubles and RBI totals and had an equal on-base

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<tr>
<th>Delmon Young26</th>
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<tr>
<td>Platform</td>
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<td>Career Totals</td>
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29 Id.
percentage to Davis’ mark despite a much higher batting average.\textsuperscript{30} In fact, Young struggled so much that despite a torrid spring he finished the year on the wrong side of a platoon with fellow outfielder Jason Kubel, playing in only 108 games despite staying healthy the entire year.\textsuperscript{31}

As much as Davis improved his value by showing his immense potential in the last four months of his platform year, Young had the complete opposite trajectory and left more questions than answers as to his ability to hit for power. Therefore, despite playing in fewer games Davis should be valued at a level higher than Delmon Young and should received a higher salary than the $2.6 million Young received for the 2010 season.

3. \textit{Garrett Jones - $2.25 million}

<table>
<thead>
<tr>
<th>Figure 6 – Ike Davis v. Garrett Jones</th>
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<tbody>
<tr>
<td>Year</td>
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<td>IKE DAVIS\textsuperscript{32}</td>
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<td>Platform</td>
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<tr>
<td>Career Totals</td>
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<tr>
<td>GARRETT JONES\textsuperscript{33}</td>
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<td>Platform</td>
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<td>Career Totals</td>
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Garrett Jones (“Jones”) was first time arbitration eligible following the 2011 Major League Season.\textsuperscript{34} Jones lost in arbitration against the Pittsburgh Pirates and thus was awarded a salary of $2.25 million for the 2012 season.\textsuperscript{35} Jones is a similar player to Davis, however Davis’ offensive numbers are simply better overall. Davis’ elite home run numbers and other offensive statistics surpass Jones in almost every category during their platform years. Moreover, Davis has more home runs and RBIs per 162 game average than Jones in his career. Jones has a

\textsuperscript{30} Id.  
\textsuperscript{31} Id.  
\textsuperscript{32} http://www.baseball-reference.com/players/d/davisik02.shtml.  
\textsuperscript{33} http://www.baseball-reference.com/players/j/jonesga02.shtml.  
\textsuperscript{34} http://www.baseballprospectus.com/compensation/cots/national-league-central/pittsburgh-pirates/.  
\textsuperscript{35} http://www.baseball-reference.com/players/j/jonesga02.shtml.
slightly better BA than Davis, however Davis makes up for these numbers with a higher OBP, SLG and OPS.\textsuperscript{36} Lastly, when looking at their career numbers their BA’s become indistinguishable with Jones holding a slight edge (.259) over Davis (.252).

More significant than his career numbers, Jones’ struggles in his platform season differentiate him from Davis. While Davis showed considerable potential with his strong finish to his platform year, Jones’ platform year gives the opposite impression. Jones struggled in the second half of his platform year, hitting .239 with an anemic .305 on base percentage and only seven home runs.\textsuperscript{37} This contributed to the Pirates’ 2011 collapse, where they went from four games above .500 and one game back of the division leading Cardinals at the All-Star break to finishing 18 games under .500 for their 19\textsuperscript{th} consecutive losing season.\textsuperscript{38}

Furthermore, Jones is much older than Davis at 30 years old compared to Davis at 25. This gives Jones’ career a significantly less rosy outlook than Davis’ does, and gives Davis much more value. Therefore, the club’s salary offer of $2.4 million is unjustified and the Player’s offer of $3.0 million is the only appropriate salary offer for Davis given his career to date.

\textbf{III. CONCLUSION AND REQUEST FOR A HEARING DECISION}

Ike Davis has been a breath of fresh air for the Mets’ organization. His elite power and defensive prowess justify a salary of $3.0 million dollars, especially when compared to the performance of similar players. Davis’ potential earns him a much higher value than Garrett Jones and Delmon Young, placing him just under James Loney’s fourth year salary of $3.1 million. Therefore, the Player’s offer of $3.0 million is the only suitable salary level for Davis’ 2013 contract.

\textsuperscript{36} Id.  
\textsuperscript{37} Id.  
\textsuperscript{38} Id.  
\textsuperscript{39} http://www.coolstandings.com/baseball_standings.asp.