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I. Introduction and Request for Hearing Decision

This brief will analyze the past and present contributions of Ike Davis (“Mr. Davis”), first baseman for the New York Mets. The Major League Baseball Collective Bargaining Agreement (“CBA”) provides the proper procedure to govern the present arbitration hearing. Under CBA Article VI, Section E, Part 10(a) & (b) the criteria considered in determining the player’s award, include: (1) the quality of the players 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 his career contribution; (3) the record of the Player’s past compensation; (3) comparative baseball salaries; (4) the existence of any physical or mental defects on the part of the Player; (5) and the recent performance record of the Club including but not limited to its League standing and attendance as an indication of public acceptance.\(^1\)

Mr. Davis is a 25-year-old power hitting first basemen for the New York Mets. Mr. Davis currently has 2.168 years of major league service,\(^2\) making him arbitration eligible for the first time under the Super Two exception.\(^3\) Mr. Davis requested a salary of $3 million for the 2013 season, an offer that the Mets have countered with $2.4 million. Based on previous performance and the salaries paid to comparable first-time arbitration eligible first basemen, Mr. Davis respectfully requests that the arbitration panel find that his fair value for the 2013 season is above the $2.7 million midpoint.

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

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<thead>
<tr>
<th>Year(^4)</th>
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<th>OPS</th>
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<tr>
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<td>156</td>
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<td>.308</td>
<td>.462</td>
<td>.771</td>
<td>.246</td>
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\(^3\) [Id.](http://www.baseball-reference.com/players/d/davisik02.shtml)

\(^4\) [Id.](http://www.baseball-reference.com/players/d/davisik02.shtml)
Over the course of Mr. Davis’ platform season (2012) he appeared in 156 games at first base. During this time Mr. Davis posted impressive power numbers and was among the top first basemen in terms of runs produced. Mr. Davis’ 32 home runs during the 2012 season ranked as third best among all first basemen and tied for fourteenth best among all players in Major League Baseball. Further, Mr. Davis’ 90 RBI ranked eighth among all first basemen in Major League Baseball and fourth among all first basemen in the National League (“NL”). Finally, during the 2012 season Mr. Davis averaged one home run per every 16.2 at bats, which ranked third out of all players in the National League and second out of all first baseman in Major League Baseball. As such, Mr. Davis is one of the elite run producers in the game.

The Mets will likely point out Mr. Davis’ lack of patience at the plate, based on his strike out rate and on base percentage. However, Mr. Davis’ average of 4.05 pitches per plate appearance ranks third among all qualifying first basemen. In addition, the Mets will likely try to argue that Mr. Davis’ comparatively low slugging percentage suggests a lack of power. This argument is baseless, as Mr. Davis’ 58 extra base hits rank eighth out of all qualifying first basemen. Mr. Davis’ slightly deflated slugging percentage can be attributed to his batting average rather than to his lack of general power. Furthermore, Mr. Davis’ batting average is the result of his lowest batting average on balls in play (“BABIP”) of his career. BABIP is measured by the amount of balls put in play that result in hits. In the 2012 season Mr. Davis posted a BABIP of .246, which was significantly lower than the league average of .300. This suggests

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5 Id.
6 http://espn.go.com/mlb/stats/batting/_/sort/homeRuns
7 http://espn.go.com/mlb/stats/batting/_/position/1b/league/nl/sort/RBIs
9 http://espn.go.com/mlb/stats/batting/_/position/1b/sort/extraBaseHits/type/expanded
that his batting average is artificially deflated as a result of opposing teams’ defensive performances or simple bad luck.\textsuperscript{12}

III. Career Contributions and the Existence of Physical or Mental Defects

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<th>Year</th>
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<td>141</td>
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<td>.308</td>
<td>.462</td>
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</tr>
<tr>
<td>Career</td>
<td>339</td>
<td>159</td>
<td>295</td>
<td>58</td>
<td>186</td>
<td>150</td>
<td>310</td>
<td>.252</td>
<td>.336</td>
<td>.461</td>
<td>.797</td>
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</tbody>
</table>

Mr. Davis’ career, with the exception of one injury, has been marked by steady improvement. The New York Mets drafted Mr. Davis with the eighteenth overall pick in the 2008 MLB draft.\textsuperscript{14} After spending the 2008 and 2009 seasons split between the Mets class A and AA affiliates, and the first 10 games of 2010 with the Mets AAA affiliate,\textsuperscript{15} Mr. Davis made his major league debut on April 19, 2010 at the age of 23.\textsuperscript{16} In 2010 Mr. Davis posted a very strong season across the board. Mr. Davis played in 147 games at first base with 601 plate appearances; he also hit 19 home runs and 71 RBI, both of which ranked third among all qualifying rookies.\textsuperscript{17} Furthermore, Mr. Davis ranked sixth in hits and third in doubles among all rookies with 138 and 33 respectively.\textsuperscript{18} His high level of production and reliability during his rookie season ultimately earned him seventh place in NL rookie of the year voting.\textsuperscript{19}

After an excellent rookie campaign in 2010, Mr. Davis started strong in 2011. Through 37 games, he hit 7 home runs and 25 RBI, which put him on pace to hit 31.5 home runs and 112

\textsuperscript{12} \url{http://www.fangraphs.com/library/index.php/offense/babip/}
\textsuperscript{13} \url{http://www.baseball-reference.com/players/d/davisik02.shtml}
\textsuperscript{14} \textit{Id.}
\textsuperscript{15} \textit{Id.}
\textsuperscript{16} \url{http://www.baseball-reference.com/players/d/davisik02.shtml}
\textsuperscript{17} \url{http://mlb.mlb.com/stats/sortable_rookie.jsp}
\textsuperscript{18} \textit{Id.}
\textsuperscript{19} \url{http://www.baseball-reference.com/players/d/davisik02.shtml}
RBI through a full 162 games. Furthermore, Mr. Davis’ batting average, OBP, slugging percentage, and OPS through nearly a quarter of the season were all significantly higher than his stats in the previous year. Unfortunately, on May 10, 2011, Mr. Davis collided with David Wright and rolled his ankle, which caused him to suffer a bone bruise and cartilage damage. While surgery was not required, Mr. Davis was forced to miss the remainder of the 2011 season.

Despite missing a considerable amount of time, Mr. Davis returned for opening day and played in 158 out of 162 games during the 2012 season. This consistency suggests that his ankle is fully healed and will not be a problem in the future. Further, the missed time clearly had no effect on Mr. Davis’ production as his stats in his 2012 campaign topped those posted in his strong rookie season. Finally, during the 2012 season, reports surfaced that the organization was displeased with Mr. Davis’ off the field conduct, namely allegations that he was staying out too late. However, notwithstanding these allegations, Mr. Davis has not missed any game time and continues to perform at a high level on the field. Moreover, at 25 years old, Mr. Davis is still maturing.

At the beginning of the 2013 season, Mr. Davis will only be 26 years old. While every player is different, statistics show that on average major league batters do not hit their performance peaks until around the age of 29. These statistics, coupled with the steady upward trend in Mr. Davis’ performance to date, point to continued improvement for years to come.

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20 Id.
21 Id.
22 http://espn.go.com/blog/new-york/mets/post/_/id/36491/ike-davis-recovering-well-from-ankle-woes
23 Id.
25 http://usatoday30.usatoday.com/sports/mlb/mets/story/2012/09/18/mets-ike-davis-says-nightlife-concerns-were-cheap-shot/57804432/1
IV. Past Player Compensation

Mr. Davis currently has 2.168 years of major league service, making him arbitration eligible for the first time.\textsuperscript{28} As a result, Mr. Davis’ salary for each year of Major League service has been close to the league minimum.\textsuperscript{29} During the 2012 season Mr. Davis made $506,690,\textsuperscript{30} slightly over the league minimum of $480,000.\textsuperscript{31} However, Mr. Davis has proven to be a reliable power threat and has produced at a level warranting a significant increase in salary.

V. Comparative Player Salaries

Mr. Davis believes that a salary of greater than the $2.7 million midpoint accurately reflects his value as a young power-hitting first baseman. This belief is bolstered by the platform year statistics, and subsequent contracts, of comparable first-time arbitration eligible first basemen. Comparisons to the salaries paid to Garrett Jones, James Loney, and Casey McGehee in their first time arbitration-eligible years provide support for Mr. Davis’ request.

a. Garrett Jones ($2.25 million in 2012\textsuperscript{32})

<table>
<thead>
<tr>
<th>Player/Year</th>
<th>G</th>
<th>R</th>
<th>H</th>
<th>HR</th>
<th>RBI</th>
<th>BB</th>
<th>SO</th>
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<th>SLG</th>
<th>OPS</th>
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<tr>
<td>Jones 2011\textsuperscript{33}</td>
<td>148</td>
<td>51</td>
<td>103</td>
<td>16</td>
<td>58</td>
<td>48</td>
<td>104</td>
<td>.243</td>
<td>.321</td>
<td>.433</td>
<td>.753</td>
</tr>
<tr>
<td>Davis 2012\textsuperscript{34}</td>
<td>156</td>
<td>66</td>
<td>118</td>
<td>32</td>
<td>90</td>
<td>61</td>
<td>141</td>
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A comparison between Jones’ and Mr. Davis’ statistics supports the conclusion that Mr. Davis’ value is higher than the $2.7 Million midpoint. While Jones’ salary of $2.25 million was $475,000 less than the midpoint, the disparity between Jones’ relevant statistics and those of Mr. Davis more than account for the $475,000 difference.

\textsuperscript{28} http://www.baseball-reference.com/players/d/davisik02.shtml
\textsuperscript{29} Id.
\textsuperscript{30} Id.
\textsuperscript{31} http://www.baseball-reference.com/bullpen/Minimum_salary
\textsuperscript{32} http://www.baseball-reference.com/players/j/jonesga02.shtml
\textsuperscript{33} Id.
\textsuperscript{34} http://www.baseball-reference.com/players/d/davisik02.shtml
In 2011, Jones’ platform year, he played in 148 games for the Pittsburgh Pirates split between right field and first base. During that time he hit 16 home runs and 58 RBI, representing totals significantly lower than his production the previous year.\(^{35}\) Despite a significant regression in run production coming from a first baseman/right fielder—both typically power positions—the Pittsburgh Pirates awarded Jones a comparable salary to that which the Mets are offering Mr. Davis. Mr. Davis, on the other hand, hit 32 home runs in 156 games in 2012,\(^{36}\) double the amount of Jones. In addition, Mr. Davis drove in 90 runs.\(^{37}\) Both of these statistics are career highs for Mr. Davis, suggesting increased future production.

While Jones’ batting average and on base percentage are slightly better than those of Mr. Davis, these numbers are typically viewed as secondary to power statistics when dealing with first basemen. This is not a position that typically produces leadoff hitters; rather, first basemen generally bat in the middle of the order to produce power and create runs. Moreover, power and run production are the primary areas where Mr. Davis excels and has shown steady improvement throughout his career. Further, while both Jones’ slugging percentage and OPS are also both slightly higher than those of Mr. Davis, the simple fact is that Mr. Davis produces significantly more runs than Jones. As a result, we believe that a salary over the $ 2.7 million midpoint accurately reflects the value inherent in the fact that Mr. Davis produced just fewer than 50% more runs than Jones did in their respective platform years.

b. James Loney ($ 3.1 million in 2010\(^{38}\))

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<tr>
<th>Player/Year</th>
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<tr>
<td>Loney 2009</td>
<td>158</td>
<td>73</td>
<td>162</td>
<td>13</td>
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<td>70</td>
<td>68</td>
<td>.281</td>
<td>.357</td>
<td>.399</td>
<td>.756</td>
</tr>
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\(^{37}\) Id.


\(^{39}\) Id.
First baseman James Loney does not provide as close of a comparison given the fact that he is further removed from his first year of arbitration eligibility and, unlike Mr. Davis, his first year came after three full years of major league service. However, the comparison remains viable because Loney was still first time arbitration eligible, and because Loney was paid above the current midpoint at a time when the average MLB salaries were almost $200,000 than they are today. James Loney’s contract paid him $3.1 million—$400,000 more than the midpoint in the present case. Further, Mr. Davis’ power statistics in 2012 are either comparable to or better than Loney’s statistics during his platform year in 2009.

During Mr. Davis’ and Loney’s platform years they played in 156 and 158 games respectively. During these seasons, Mr. Davis and Loney had generally comparable numbers with regards to run production. Mr. Davis hit 32 home runs, significantly more than the 13 hit by Loney. However, both players hit 90 RBI, ultimately resulting in the same amount of run production. Loney has the slight edge in runs scored with 73 compared to Mr. Davis’ 66, however, these numbers are close enough to warrant comparison. While Loney has an edge over Mr. Davis with regards to batting average and on base percentage, Mr. Davis’ eclipses Loney’s totals in both slugging percentage and OPS, both of which are indicative of power—a necessary attribute for a first baseman.

40 http://www.baseball-reference.com/players/d/davisik02.shtml
41 http://www.baseball-reference.com/players/l/loneyja01.shtml
44 http://www.baseball-reference.com/players/l/loneyja01.shtml
47 Id.
On the basis of the foregoing statistics, Loney was offered a contract worth $3.1 million dollars for the following season. Given the similarity in both players’ run production during their platform years it is clear that Mr. Davis is entitled to a contract similar in value to that of Loney. Finally, the fact that the current midpoint is $400,000 less than Loney’s contract coupled with the fact that salaries are now on average approximately $200,000 higher than they were in 2010 clearly shows that Mr. Davis’ fair value is higher than the $2.7 million midpoint.

c. Casey McGehee ($2.537 million in 2012\textsuperscript{49})

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<tr>
<th>Player/Year</th>
<th>G</th>
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<tbody>
<tr>
<td>McGehee 2011\textsuperscript{50}</td>
<td>155</td>
<td>46</td>
<td>122</td>
<td>13</td>
<td>67</td>
<td>45</td>
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<tr>
<td>Davis 2012\textsuperscript{51}</td>
<td>156</td>
<td>66</td>
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Finally, as an infielder that has played a significant number of games at first base during the course of his career, Casey McGehee serves as a viable comparison to Mr. Davis. Despite the fact that McGehee had three full years of MLB service at the time, his contract was still signed when he was first time eligible for arbitration, making it a relevant comparison. Further, McGehee’s contract was worth $137,000 more than what the Mets are currently offering Mr. Davis and only $163,000 less than the $2.7 million midpoint in the present case. In addition, McGehee was 28 during his platform year in 2011 while Mr. Davis is currently 25. Finally, Mr. Davis’ relevant statistics for a first baseman were significantly better than those of McGehee.

During Mr. Davis’ and McGehee’s platform seasons they played a comparable amount of games with 156\textsuperscript{52} and 155\textsuperscript{53} respectively. The statistical differences during this sample size, however, speak volumes towards Mr. Davis having a significantly higher value than McGehee.

\textsuperscript{49} http://www.baseball-reference.com/players/m/mcgehca01.shtml
\textsuperscript{50} Id.
\textsuperscript{51} http://www.baseball-reference.com/players/d/davisik02.shtml
\textsuperscript{52} Id.
\textsuperscript{53} http://www.baseball-reference.com/players/m/mcgehca01.shtml
Mr. Davis decisively out-produced McGehee in terms of runs during his platform year, hitting 90 runs compared to McGehee’s 67. This total was significantly lower than McGehee’s previous season’s production, while Mr. Davis’ total was a career high. Further, Mr. Davis significantly out-produced McGehee in terms of power numbers hitting, 32 home runs to McGehee’s 13, posting a .462 slugging percentage to McGehee’s .346, and posting a .771 OPS to McGehee’s .626. Finally, Mr. Davis and McGehee posted nearly identical numbers in terms of total hits and batting average, with Mr. Davis having a significant edge over McGehee in terms of OBP (.308 to .280).

The disparity in the above-mentioned statistics clearly supports our position that Mr. Davis is worth in excess of the $ 2.7 million midpoint. McGehee was ultimately paid $163,000 less than the midpoint, while Mr. Davis posted equal or significantly better numbers across the board. Moreover, the value of McGehee’s performance in his platform year was considered to be worth over $ 100,000 more than what the Mets are currently offering Davis. Finally, Mr. Davis is three years younger than McGehee was at the time. As such, to rule in favor of the Mets in the present arbitration hearing would result in a younger Davis being paid less than a player whom he drastically out-performed in his platform season.

VI. Recent Performance of the Club

2012 was expected to be a transitional year for the Mets due to a number of factors including: losing star short stop Jose Reyes to free agency, the return of their ace Johan Santana after missing a full year due to shoulder surgery, the potential decline of David Wright, and the

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54 http://www.baseball-reference.com/players/d/davisik02.shtml
55 http://www.baseball-reference.com/players/m/mcgehca01.shtml
57 Id.
presence of a variety of young and unproven players. However, the Mets were one of the surprise teams of the first half, entering the all-star break six games above .500 with a record of 46-40. After the all-star break was a different story, however, as the Mets went on to post a 28-48 record in the second half, finishing fourth place in the National League East with a record of 74-88 (24 games behind the first place Washington Nationals).

After a dismal finish to the 2012 season the Mets have entered yet another rebuilding period. So far during the offseason the Mets have traded Cy Young award winning pitcher R.A. Dickey to the Toronto Blue Jays, for top catching prospect Travis D’Arnaud and a pitching prospect. In addition, the Mets resigned third baseman David Wright to a lucrative long-term deal to be the veteran leader on a young team. The Mets clearly have talent in place to rebuild going forward; as a young, power hitting first baseman, Mr. Davis will be an essential aspect of this rebuilding process.

**VII. Conclusion**

Throughout the course of his young career Mr. Davis has demonstrated the ability to be both a productive and reliable everyday first baseman. Additionally, Mr. Davis’ young age and steady improvement to this point suggest that he is yet to reach his full potential. Finally, Mr. Davis’ durability and statistics during the 2012 season show that he is 100% healthy after his season ending injury in 2011. As such, the foregoing evidence suggests that a salary above the $2.7 million midpoint accurately reflects the value of a player of Mr. Davis’ ability.

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58 http://www.nydailynews.com/sports/baseball/mets/questions-2012-ny-mets-struggle-remain-relevant-summer-article-1.1025133
59 http://www.nytimes.com/2012/07/13/sports/baseball/the-mets-hope-to-avoid-another-second-half-letdown.html?_r=0
60 http://espn.go.com/mlb/standings