2013 National Baseball Arbitration Competition

Ike Davis v. New York Mets (MLB)

SUBMISSION ON BEHALF OF: New York Mets
Club Offer: $2.4 million
Midpoint: $2.7 million
Player Request: $3.0 million

Submission by: Team 32
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ESPN, ESPN Internet Ventures, www.espn.com

Fangraphs, Fangraphs Inc., www.fangrapghs.com

MLB, Major League Baseball, www.mlb.com

MLB Collective Bargaining Agreement, “2012-2016 Basic Agreement”, Article IV (E) §10(a)-(b).
I. **INTRODUCTION AND REQUEST FOR HEARING DECISION**

This brief will analyze the statistical production, attributes, salaries, physical condition, and overall club importance of Ike Davis, First Baseman (“1B”) for the New York Mets (“Mets”). This arbitration will consider the criteria in accordance with The Major League Baseball (“MLB”) Collective Bargaining Agreement (“CBA”) between. Mr. Davis will be evaluated on: (1) his contribution to the club this past season, including his overall performance, public appeal, and leadership qualities; (2) the length and consistency of Mr. Davis’ career; (3) Mr. Davis’ past compensation; (4) comparative salaries of similar players; (5) current mental and physical defects of Mr. Davis; (6) the recent performance of the Mets, including, but not limited to, their League standing and attendance. When considering the comparative salaries of similar baseball players, attention will be paid to players whose MLB service is no greater than one year above his current annual service group.

Currently, Mr. Davis has 2.168 years of Major League service time and is eligible for arbitration for the first time by reaching “Super Two” status. Players who have at least two years of major league service but less than three achieve Super Two status if the player is among the top 22 percent for cumulative playing time in the majors in this class of players, and have been on an active major-league roster for at least 86 days in the previous season.

The New York Mets respectfully request that the arbitration panel consider the analysis in this document, as well as the argument presented at the oral argument, and find that Mr. Davis is entitled to receive a 2013 salary arbitration award of $2.4 million, equivalent to the team’s final offer, as opposed to Mr. Davis’ final demand of $3.0 million.

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1 MLB Collective Bargaining Agreement, Article VI(F)§12(a)-(b). pp. 18-19
2 Id.
3 Id.
4 http://www.baseball-reference.com/players/d/davisik02.shtml#contracts
5 MLB Collective Bargaining Agreement, Article VI(F)§12(a)-(b). pp. 18-19
II. **Quality of Ike Davis’ Contribution During Past Season**

In 2012, Mr. Davis returned from an ankle injury that forced him to miss a large portion of the 2011 season. The table below details Mr. Davis’ 2012 season:

<table>
<thead>
<tr>
<th>TABLE I – IKE DAVIS’ BATTLING STATISTICS FOR THE 2012 SEASON</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>GP</td>
<td>AVG</td>
</tr>
<tr>
<td>156</td>
<td>.227</td>
</tr>
</tbody>
</table>

Mr. Davis’ platform season got off to a horrid start. In spring training, Mr. Davis was diagnosed with Valley Fever, a pulmonary disease that affects the lungs. He was able to play through this in Spring Training, and began the season as the New York Mets starting first baseman. Mr. Davis got off to a horrid start in 2012. In the month of April, despite batting in the cleanup spot, Mr. Davis hit just .185. Mr. Davis’ slugging percentage, a measly .309, was just as bad. The month of May did not fare well for Mr. Davis either. Davis hit an even worse .154, with a slugging percentage of just .282. After the first two months of the season, Mr. Davis had a .170 batting average, while hitting just five home runs (“HR”) and 21 runs batted in (“RBI”). Additionally, Mr. Davis had already struck out 49 times. Due to his extremely slow start, the Mets were forced to drop Mr. Davis in the batting order.

Despite Mr. Davis’ struggles throughout the season, he managed to finish the year with a respectable 32 home runs and 90 runs batted in. However, these numbers do not accurately reflect Mr. Davis’ effectiveness at the plate. Mr. Davis finished the season with a .227 batting average, the 11th worst average in all of Major League Baseball. Additionally, Mr. Davis struck
out 141 times, the 6th most among first basemen. Mr. Davis also finished with a .241 batting average on balls in play ("BABIP"), ranked the 2nd worst among all first basemen.

Furthermore, Mr. Davis’ glove failed to make up for his struggles at the plate. Mr. Davis had 8 errors in 2012, the 5th most among all first basemen.

Mr. Davis’ struggles were even more visible against left-handed pitchers. In 2012, Mr. Davis hit a dreadful .174 against lefties. Furthermore, his slugging percentage against left-handed pitching was an abysmal .335. Mr. Davis’ inability to hit left-handed pitching encouraged opposing teams to bring in left-handed relievers to face him late in games. These matchups often neutralized Mr. Davis’ power threat during crucial at bats. Of Mr. Davis’ 32 home runs, just 4 came in the 8th inning or later. Moreover, Mr. Davis’ struggles were most prevalent in his home stadium. Mr. Davis hit a terrible .188 in 240 at bats in Citi Field.

Because of arbitration, we know Mr. Davis is slated to play 82 games at Citi Field next season. Mr. Davis will certainly be looking to improve on that mark.

Overall, statistics show that outside of hitting home runs, Mr. Davis’ 2012 season offered little else to help the team. He was unable to consistently get hits and struck out at an incredibly high rate. Furthermore, Mr. Davis struggled mightily against left-handed pitchers, and struggled to hit at home. His inability to hit left-handed pitchers leaves a National League team vulnerable in later innings when opposing teams are willing to matchup pitchers. In 2012, Mr. Davis

15 http://www.fangraphs.com/leaders.aspx?pos=1b&stats=bat&lg=all&qual=y&type=0&season=2012&month=0&season1=2012&ind=0&team=0&rost=0&age=0&filter=&players=0&sort=15,d
16 http://www.fangraphs.com/leaders.aspx?pos=1b&stats=bat&lg=all&qual=y&type=1&season=2012&month=0&season1=2012&ind=0&team=0&rost=0&age=0&filter=&players=0&sort=13,a
17 http://www.fangraphs.com/leaders.aspx?pos=1b&stats=fld&lg=all&qual=y&type=0&season=2012&month=0&season1=2012&ind=0&team=0&rost=0&age=0&filter=&players=0&sort=9,d
18 http://espn.go.com/mlb/player/splits/_/id/30532/ike-davis
19 Id.
20 http://www.baseball-reference.com/players/split.cgi?id=davisik02&year=2012&t=b
21 Id.
displayed some of the potential the New York Mets knew he had when they selected him with a first round draft choice in 2008. While the Mets believe in Mr. Davis, and look forward to him being an integral part of the organization, Mr. Davis still must improve on major holes in his game to truly become effective.

III. LENGTH AND CONSISTENCY OF IKE DAVIS’ CAREER CONTRIBUTIONS

Mr. Davis’ MLB career began in 2010 after being called up shortly after the start of the season. The table below displays his career numbers:

<table>
<thead>
<tr>
<th>Year</th>
<th>GP</th>
<th>AVG</th>
<th>H</th>
<th>R</th>
<th>HR</th>
<th>RBI</th>
<th>SO</th>
<th>BB</th>
<th>SB</th>
<th>SLG%</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>147</td>
<td>.264</td>
<td>138</td>
<td>73</td>
<td>19</td>
<td>71</td>
<td>138</td>
<td>72</td>
<td>3</td>
<td>.440</td>
</tr>
<tr>
<td>2011</td>
<td>36</td>
<td>.302</td>
<td>39</td>
<td>20</td>
<td>7</td>
<td>25</td>
<td>31</td>
<td>17</td>
<td>0</td>
<td>.543</td>
</tr>
<tr>
<td>2012</td>
<td>156</td>
<td>.227</td>
<td>118</td>
<td>66</td>
<td>32</td>
<td>7</td>
<td>141</td>
<td>61</td>
<td>0</td>
<td>.462</td>
</tr>
<tr>
<td>Totals</td>
<td>339</td>
<td>.252</td>
<td>295</td>
<td>159</td>
<td>58</td>
<td>186</td>
<td>310</td>
<td>150</td>
<td>3</td>
<td>.461</td>
</tr>
</tbody>
</table>

Mr. Davis’ MLB career started off nicely. In his rookie season, Mr. Davis hit 19 home runs and 71 RBI, to go along with a solid .264 average. Despite striking out 138 times in just 147 games, it appeared that Mr. Davis was on track to steadily improve. However, in 2011, Mr. Davis’ season was cut short due to a season ending ankle injury after just 36 games. Mr. Davis fell while attempting to catch a routine infield pop up. Initially, the injury did not appear serious, however after multiple setbacks, Mr. Davis was forced to miss the entire rest of the season.

Mr. Davis is a “Super Two”, and will have three additional years of arbitration to make the money he requests today. At the moment, however, he has been unable to provide the length and consistency necessary to warrant more than $2.7 million. While there is no doubt Mr. Davis has potential, his career thus far has been wildly inconsistent. Despite posting solid statistics in his rookie season, Mr. Davis missed a large majority of the 2011 season, and in 2012, regressed.
substantially. Mr. Davis has been unable to improve on his walk totals, and has failed to cut down on his strikeouts. His average and on-base percentage has dropped substantially, and even his fielding has been inconsistent.27 Under the CBA, players must only be evaluated on past performance, and not future potential. Based on Mr. Davis’ lack of length or consistency to his career, it is clear that the $2.4 million dollar offer is fair and appropriate compensation for Mr. Davis’ performance thus far.

IV. PAST PLAYER COMPENSATION
Under the CBA, a player becomes eligible for arbitration when he has reached 3 years of Major League service, or has achieved “Super Two” status.28 Mr. Davis made his major league debut on April 19th, 2010 and has 2.168 years of MLB experience.29 In 2013, Mr. Davis will be arbitration eligible for the first time, achieving “Super Two” status.30 Mr. Davis ranked among the top 22 percent for cumulative playing time in the majors among players with greater than two, but less than three years of service time. Additionally, Mr. Davis was on the New York Mets active Major League roster for at least 86 days in 2011.

In 2010 Mr. Davis’ contract was purchased from the minor leagues.31 In 2011, received his first Major League contract, signing a 1-year deal worth $432,000.32 In 2012, Mr. Bailey received a slight raise, signing a 1-year deal worth $506,690.33 Currently, the New York Mets organization is offering Mr. Davis a $2.4 million dollar contract, a 374% increase on his 2012 salary. Mr. Davis has shown to be inconsistent and unreliable through his first three years in the MLB. While the New York Mets look forward to a long future with Mr. Davis, at this point in

28 MLB Collective Bargaining Agreement, Article VI(F)§12(a)-(b). pp. 18-19
29 http://www.baseball-reference.com/players/d/davisik02.shtml#contracts
30 Id.
31 Id.
32 Id.
33 Id.
time, his body of work is incomplete. Therefore, Mr. Davis should be awarded the $2.4 million dollar offer from the New York Mets.

V. COMPARATIVE BASEBALL SALARIES
This section will compare Mr. Davis to Garrett Jones of the Pittsburgh Pirates, Ian Stewart of the Colorado Rockies, and Chase Headley of the San Diego Padres. The CBA’s provisions on salary arbitration direct the panel to “give particular attention, for comparative salary purposes, to the contracts of Players with Major League service not exceeding one annual service group above the Player’s annual service group.” Each of the three comparative players, like Mr. Davis, achieved “Super Two” status. The following table compares the respective careers of Mr. Davis, Mr. Jones, Mr. Stewart and Mr. Headley.

| Table 3 - Comparison of Comparable Hitters |
|________________________________________|
| | GP | AVG | H | R | HR | RBI | SO | BB | SB | 2B | OBP | SLG | OPS |
| 2012 | 156 | .227 | 118 | 66 | 32 | 90 | 141 | 61 | 0 | 26 | .308 | .462 | .771 |
| Career | 339 | .252 | 295 | 159 | 58 | 186 | 310 | 150 | 3 | 67 | .336 | .461 | .797 |
| **Garrett Jones** | Pittsburgh Pirates 1B/RF | DOB – 06/21/81 | 2011 Salary – $455,500 | 2012 Salary - $2.25 million | Service: 2.164 |
| | GP | AVG | H | R | HR | RBI | SO | BB | SB | 2B | OBP | SLG | OPS |
| 2011 | 148 | .243 | 103 | 51 | 16 | 58 | 104 | 48 | 6 | 30 | .321 | .433 | .753 |
| Career | 419 | .258 | 357 | 167 | 60 | 193 | 323 | 147 | 24 | 87 | .323 | .450 | .772 |
| **Ian Stewart** | Colorado Rockies 3B | DOB – 04/05/85 | 2010 Salary - $408,000 | 2011 Salary – $2.28 million | Service: 2.050 |
| | GP | AVG | H | R | HR | RBI | SO | BB | SB | 2B | OBP | SLG | OPS |
| 2010 | 121 | .256 | 99 | 54 | 18 | 61 | 110 | 45 | 5 | 14 | .338 | .443 | .781 |
| Career | 349 | .246 | 265 | 161 | 53 | 172 | 342 | 131 | 13 | 51 | .334 | .454 | .788 |
| **Chase Headley** | San Diego Padres 3B | DOB – 05/09/84 | 2010 Salary - $427,700 | 2011 Salary – $2.32 million | Service: 2.123 |
| | GP | AVG | H | R | HR | RBI | SO | BB | SB | 2B | OBP | SLG | OPS |
| 2010 | 161 | .254 | 161 | 77 | 11 | 58 | 139 | 56 | 17 | 29 | .327 | .375 | .702 |
| Career | 416 | .264 | 396 | 174 | 32 | 160 | 380 | 150 | 31 | 80 | .335 | .390 | .725 |

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34 MLB Collective Bargaining Agreement, Article VI(F)§12(a)-(b). pp. 18-19
35 http://espn.go.com/mlb/player/splits/_/id/30532/ike-davis
38 http://www.baseball-reference.com/players/h/headlch01.shtml
A. Garret Jones (2.25 million)

Garrett Jones became arbitration eligible for the first time following the 2011 season. Like Mr. Davis, Mr. Jones is a first basemen and was arbitration eligible as a “Super Two.”39 For the first two service years, Mr. Jones received similar compensation as Mr. Davis.40 After the 2011 season, Mr. Jones lost his arbitration hearing, and was awarded $2.25 million dollars, slightly less than what Mr. Davis is currently seeking.41 Mr. Jones’ platform season was very similar to that of Mr. Davis. Mr. Jones played in eight games, but still managed to almost match Mr. Davis’ total hits.42 While Mr. Davis hit more HRs and RBIs in his platform season, Mr. Jones had a batting average 16 points higher than Mr. Davis.43 Furthermore, he recorded less strikeouts and had a superior on base percentage. Additionally, Mr. Jones had more doubles, and provided a bit of speed on the base path, stealing 6 bases to Mr. Davis’.44

For his career, Mr. Jones has played 78 more games than Mr. Davis.45 That is nearly a half a season more experience that cannot be overlooked when compensating a player for length and consistency. Consequently, Mr. Jones has 62 more hits than Mr. Davis.46 Furthermore, Mr. Jones slightly bests Mr. Davis for total HRs, RBIs and runs. Mr. Jones has a better career batting average, as well as substantially more doubles. Mr. Jones has also stole 24 bases for his career, compared to Mr. Davis’ 3. Ultimately, Mr. Jones has posted very similar numbers to Mr. Davis, while being able to remain healthy and consistently take the field, and unlike Mr. Davis, Mr.

40 Id.
41 Id.
42 Id.
43 Id.
44 Id.
45 Id.
46 Id.
Jones can play multiple positions, being used consistently at both first base as well as right field.47

B. Ian Stewart (2.28 million)
Ian Stewart became arbitration eligible following the 2010 season as a “Super Two.”48 For his first two service years, Ian Stewart was compensated very similarly to Mr. Davis. Following his platform season, Mr. Stewart avoided arbitration, signing a $2.28 million dollar contract with the Colorado Rockies.49 While Mr. Stewart is not a first baseman, he does play third base, the most comparable position with regards to both hitting and fielding. In his platform season, Mr. Stewart also performed very similarly to Mr. Davis. While Mr. Stewart hit less HRs and RBIs than Mr. Davis, this was largely attributed to playing in 30 fewer games than Mr. Davis.50 Regardless, Mr. Stewart hit for an average nearly 30 points higher than Mr. Davis, while recording an OPS slightly better than Mr. Davis as well.51 Furthermore, Mr. Stewart was on pace to record a substantially more amount of hits, finishing with 19 less hits in 30 fewer games.52

For Mr. Stewart’s career, his numbers are even more similar to those of Mr. Davis. Mr. Stewart nearly matches Mr. Davis in HRs, RBIs, hits, runs, and batting average. Furthermore, Mr. Stewart’s career OBP, SLG and OPS are within just a few points of Mr. Davis. Finally, like Mr. Jones, Mr. Stewart has shown the versatility to be able to play two positions, both third base as well as second base, while Mr. Davis can only play first base.

47 Id.
49 Id.
50 Id.
51 Id.
52 Id.
Lastly, Chase Headley, also a “Super Two,” became arbitration eligible following the 2010 season. Mr. Headley received similar compensation as Mr. Davis for his first two service years, and received $2.32 million, just above the New York Mets offer, but well below the midpoint of $2.7 million. In Mr. Headley’s platform season, he totaled nearly 50 more hits than Mr. Davis, while hitting for an average 30 points higher than Mr. Davis as well. While Mr. Davis does have stronger power numbers, Mr. Headley also stole a substantial 17 bases. For his career, Mr. Headley has played more games than Mr. Davis, while amassing a similar average and on base percentage. Furthermore, for his career, Mr. Headley totaled 100 more hits and Mr. Davis. Moreover, the length and consistency of Mr. Headley’s career, compared to that of Mr. Davis, cannot be overlooked when comparing compensation.

Furthermore, Garrett Jones, Ian Stewart, and Chase Headley each achieved “Super Two” status while putting up comparable numbers to Mr. Davis not only in their platform year, but also for their career. Additionally, Mr. Jones and Mr. Stewart have added value because they play multiple positions, something Mr. Davis has not done. Mr. Jones and Mr. Headley have also played nearly a half a season more than Mr. Davis, strengthening the length and consistency of their careers. When considering the similarities in the platform seasons and career totals of these three players, it is clear that Mr. Davis should receive similar compensation. Thus, Mr. Davis should be awarded $2.4 million dollars, the New York Mets final offer.

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53 http://www.baseball-reference.com/players/h/headlch01.shtml
54 Id.
55 Id.
56 Id.
57 Id.
58 Id.
VI. **Existing Physical or Mental Defects**
While Mr. Davis missed most of the 2011 season with an ankle injury, and was previously diagnosed with valley fever, he played the entire 2012 season and is entering 2013 healthy.\(^{59}\)

VII. **Recent Performance of the New York Mets**
The New York Mets finished the 2012 season with 74 wins and 88 losses, earning a fourth place finish in the National League East.\(^{60}\) Despite Mr. Davis’ major struggles in April and May, the New York Mets entered June with 28 wins and 23 loses.\(^{61}\) Additionally, the New York Mets have failed to reach the postseason since Mr. Davis’ joined the team in 2010.\(^{62}\)

VIII. **Conclusion**
The New York Mets organization has a great appreciation for Mr. Davis, and looks forward to him being a part of the organization for years to come. However, to this date, Mr. Davis has failed to provide the consistency expected from him. Mr. Davis missed nearly all of the 2011 season, and has played in just 339 games to date. In 2012, Mr. Davis struggled to find any sort of consistency, hitting just .227 with an on base percentage of just .308. Furthermore, Mr. Davis hit a meager .174 against left-handed pitchers, and hit just .188 in his home Citi Field. Mr. Davis’ inability to both hit lefties, as well as hit at home, further highlight Mr. Davis’ struggles to successfully help the club. When comparing his numbers to past “Super Two” players, it is evident that Mr. Davis should receive the New York Mets final offer of $2.4 million.

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\(^{61}\) Id.

\(^{62}\) Id.