2013 NATIONAL BASEBALL ARBITRATION COMPETITION

Tommy Hanson v. Atlanta Braves (MLB)

SUBMISSION ON BEHALF OF: Tommy Hanson
Club Offer: $3.5 million
Midpoint: $3.9 million
Player Request: $4.3 million

Submission by: Team 32
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**ESPN**, ESPN Internet Ventures, [www.espn.com](http://www.espn.com)  
**Fangraphs**, Fangraphs Inc., [www.fangraphs.com](http://www.fangraphs.com)  
**MLB**, Major League Baseball, [www.mlb.com](http://www.mlb.com)  
**MLB Collective Bargaining Agreement**, “2012-2016 Basic Agreement”, Article IV (E) §10(a)-(b).
I. REQUEST FOR ARBITRATION HEARING

This brief analyzes the contributions of Atlanta Braves (hereinafter “Braves” or “Club”), starting pitcher Tommy Hanson, for an arbitration hearing governed by the Major League Baseball Collective Bargaining Agreement (hereinafter “CBA”). The criteria to be considered in this arbitration hearing include: (1) past compensation, (2) length and consistency of player’s career contributions, (3) quality of the player’s contributions to the club during the past season, (4) comparative baseball salaries, (5) lack of physical defects, and (6) recent club performance.\(^1\)

Based on these criteria, we request the panel to find that Mr. Hanson is entitled to an award of $4.3 million.

II. PAST COMPENSATION

Mr. Hanson currently has 3.120 years of Major League service to his credit, and is arbitration eligible for the first time.\(^2\) Tommy was drafted in the 22nd round of the 2005 amateur draft by the Braves.\(^3\) He made his Major League debut in 2009 against the Milwaukee Brewers and has remained a starting pitcher for the Braves ever since.\(^4\) After finishing his rookie season with 11 wins and 4 losses, Tommy received a $435,000 salary for the 2010 season.\(^5\) Tommy continued to improve as a starting pitcher and in 2010 he eclipsed the 200 innings pitched (“IP”) mark for the first time in his career.\(^6\) Nonetheless, he was awarded an insufficient raise receiving $456,500 in total compensation for the 2011 season.\(^7\) While struggling with injuries in 2011,

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\(^7\) Cot’s Baseball Contracts, *supra* note 2.
Tommy still managed to win 11 games for his club. Due to those injuries, he missed his opportunity to become a Super Two by only a few games and thus he only received a 2012 salary of $535,000.

The Braves offered Mr. Hanson a salary of $3.5 million which would be undervaluing him considering all that Tommy has done for their organization. Today Mr. Hanson requests that the arbitration panel award him a 2013 salary of $4.3 million. Mr. Hanson is of the position that he has earned a salary of this amount due to his ability to pitch effectively over the past four seasons, regularly putting the Braves in a position to win ball games. Furthermore, Mr. Hanson believes that he has not been paid a reasonable salary over the past few years, which compares to his performance on the field. Simply put, Tommy deserves a raise. Finally, Mr. Hanson has submitted comparative baseball salaries in Section V which will prove that he is worth well over the midpoint value of $3.9 million.

III. LENGTH AND CONSISTENCY OF TOMMY HANSON’S CAREER CONTRIBUTIONS

Mr. Hanson’s career contributions evidence two factual propositions: (1) he is a dependable pitcher who averages over 150 IP per season, and (2) he has proven to be statistically consistent. The following table outlines Tommy’s statistical performance for his career:

<table>
<thead>
<tr>
<th>Table 1 – Tommy Hanson’s Career Statistics</th>
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<td>2009</td>
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<td>2010</td>
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<td>2011</td>
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<tr>
<td>2012</td>
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<tr>
<td>Totals</td>
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</table>

Tommy was selected in the 22nd round of the 2005 draft and yet, it did not take long for him to establish himself as one of the top young arms in the game. He earned countless accolades during his minor league career and carried that momentum with him when he entered the majors.

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8 Baseball-Reference, supra note 3.
10 Baseball-Reference, supra note 3.
in 2009. During his rookie campaign, Tommy won 11 games and posted an astounding 2.89 ERA. Batters could not handle his fast yet slicing slider or his table dropping curveball. As a result, Tommy recorded an excellent 8.2 strikeout per 9 inning (“SO/9”) ratio. He ended up winning the Rookie of the Month award in June and finished 3rd in Rookie of the Year voting.  

Tommy put together his best season during the summer of 2010. During 2010, he started in 34 games, 2nd in the NL and recorded 202.2 IP, 17th in the NL. Additionally, he posted a 3.33 ERA and a 1.17 WHIP, 17th and 12th in the NL respectively. Furthermore, he recorded a .239 BAA, 14th in the NL, and registered 173 SO, 17th in the NL. Despite his terrific performance and by no fault of his own, 2010 is the only season when Tommy did not register a winning record. After the All-Star break, he finished the year with 2 wins and 5 losses, despite posting a dominant 2.51 ERA and 0.97 WHIP down the stretch.  

Due to all of his early success, the Braves named Tommy as their number two starter for the 2011 season. He did not disappoint. In the first half of the 2011 season, Tommy recorded 10 wins and 4 losses while posting a 2.44 ERA. Arguably Tommy deserved an All-Star selection but, Bruce Bochey, All-Star manager and manager for the San Francisco Giants, choose one of his own players instead, Matt Cain. Over the first half of the 2011 season, Cain recorded 8 wins and 5 losses while posting a 3.06 ERA. Although Mr. Cain is a great pitcher, he did not have the statistics to compare with Tommy’s work at that point in the season.

11 MLB, Tommy Hanson, available at: http://mlb.mlb.com/team/player.jsp?player_id=462102#gameType='R'&sectionType=career&statType=2&season=2012&level='ALL'
Unfortunately, the 2011 season did not end well for Tommy. He began to experience pain in his right shoulder and his ability to pitch suffered because of it. On August 6, he tore his rotator-cuff and missed the rest of the season. Overall, 2011 was still a successful year for him. Again he recorded over 10 wins for the third time in his young career, while posting a low 1.16 WHIP and 3.60 ERA, and he posted a better SO/9 ratio than stars such as Cy Young award winners Clayton Kershaw and Tim Lincecum.

Throughout his career, Tommy has proven that he is a reliable number two or three starting pitcher. He has won at least 10 games every year of his career and his career 8.4 SO/9 ratio ranks him among the best strikeout pitchers in the game today.

Tommy is arbitration eligible for the first time although he has pitched in over 635 innings throughout his young career. He has proven again and again, that he is capable of carrying a heavy workload. For example, in 2012, he was injured for most of the second half of the season, and yet managed to start 31 games for the Braves. The bulk of Mr. Hanson’s career demonstrates that he deserves a salary award of $4.3 million.

IV. QUALITY OF TOMMY HANSON’S PERFORMANCE DURING THE 2012 SEASON

Up until the start of the 2012 season, Tommy had a 3.28 ERA and 1.18 WHIP. In 2012, he was coming back from a shoulder injury in the previous season while adjusting his delivery in the process. This partially explains his less than stellar numbers. The following table outlines Tommy’s statistical performance for his 2012 campaign.

| TABLE 2 – TOMMY HANSON’S PITCHING STATISTICS FOR THE 2012 SEASON |
|-------------------|---|---|---|---|---|---|---|---|---|
| GS | IP | W | L | H | ER | HR | BB/9 | SO/9 | WHIP | ERA |
| 31 | 174.2 | 13 | 10 | 183 | 87 | 27 | 3.7 | 8.3 | 1.45 | 4.48 |

19 Baseball-Reference, supra note 3.
20 Id.
Tommy actually went into the All-Star Break with a 3.71 ERA and 93 strikeouts in 106.2 innings. He missed time in August with a back injury, and put up an ugly 5.69 ERA from July 14 on.\textsuperscript{21} It’s clear that Tommy’s performance suffered once he was experiencing back pain after the All-Star break. The following table compares his first and second half statistical performance.

| TABLE 3 – TOMMY HANSON’S PITCHING STATISTICS BEFORE AND AFTER THE ALL-STAR GAME\textsuperscript{22} |
|---------------------------------|--------|-----|-----|-----|-----|-----|-----|-----|-----|
|                                 | GS     | IP   | W   | L   | H/9 | HR/9 | BB/9 | SO/9 | WHIP | ERA |
| 1st Half                        | 18     | 106.2| 10  | 5   | 8.6 | 1.3  | 3.2  | 7.8  | 1.31 | 3.71 |
| 2nd Half                        | 13     | 68.0 | 3   | 5   | 10.7| 1.4  | 4.3  | 9.0  | 1.67 | 5.96 |

Tommy’s first half statistics are more indicative of the player he truly is because they are nearly identical to his career averages. In the first half of the 2012 season, Tommy allowed 8.6 H/9, 1.3 HR/9, 3.2 BB/9, and recorded 7.8 SO/9. Similarly for his career, Tommy has allowed 8.1 H/9, 0.9 HR/9, 3.1 BB/9, and has recorded 8.4 SO/9.\textsuperscript{23} Further, his 3.71 ERA before the All-Star Break is right on par with his 3.61 career ERA.\textsuperscript{24} When Tommy is injury-free, his past performances demonstrate that he is a very reliable number two or three starter. Therefore, he deserves to be paid like one.

The major problem for Tommy during the 2012 season was the amount of HRs that he allowed. This past season, he gave up a career high 27 HRs. Before that he only averaged allowing 13.1 HRs per year.\textsuperscript{25} Nevertheless, the tendency to allow HRs in 2012 did not substantially affect his ability to win ball games. Tommy gave up the most amount of HRs (8 total) in the month of June however, he recorded 4 wins and 0 losses while posting a 3.13 ERA during that span.\textsuperscript{26} He also gave up zero total HRs when the game was late and close.\textsuperscript{27}

\textsuperscript{22} Id.
\textsuperscript{23} Id. supra note 3.
\textsuperscript{24} Id.
\textsuperscript{25} Baseball-Reference, supra note 3.
\textsuperscript{26} Baseball-Reference, supra note 21.
\textsuperscript{27} As defined by Baseball-Reference.com, “late and close” games are plate appearances, in the 7th inning or later with the batting team tied, ahead by one, or the tying run at least on deck.
In fact, Tommy performed great in clutch situations throughout the 2012 season. In late and close situations he held opponents to a .250 BAA and a .286 OBP. Additionally, with runners in scoring position, Tommy held opponents to a .254 BAA.

V. COMPARATIVE BASEBALL SALARIES

According to the CBA, the comparisons to similar players provide the most tangible and compelling indications of Mr. Hanson’s value. This section will compare the value of Mr. Hanson’s services against those of established Major League players Jered Weaver, starting pitcher of the Los Angeles Angels, and Trevor Cahill, starting pitcher of the Arizona Diamondbacks. Mr. Weaver was arbitration eligible for the first time prior to the 2010 season and received a $3.8 million raise. Mr. Cahill was arbitration eligible for the first time prior to the 2012 season but he received a multi-year contract worth $30.5 million from the Oakland Athletics who bought out the rest of his arbitration eligibility. The comparisons between Mr. Hanson and Mr. Weaver and Mr. Cahill clearly indicate Mr. Hanson’s value is above the $3.9 million midpoint and therefore this panel should decide in his favor.

A. Jered Weaver – $4.265 million in 2010

<table>
<thead>
<tr>
<th>Platform Year</th>
<th>GS</th>
<th>Record</th>
<th>IP</th>
<th>HR</th>
<th>H/9</th>
<th>SO/9</th>
<th>WHIP</th>
<th>ERA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hanson</td>
<td>31</td>
<td>13-10</td>
<td>174.2</td>
<td>27</td>
<td>9.4</td>
<td>8.3</td>
<td>1.45</td>
<td>4.48</td>
</tr>
<tr>
<td>Weaver</td>
<td>33</td>
<td>16-8</td>
<td>211.0</td>
<td>26</td>
<td>8.4</td>
<td>7.4</td>
<td>1.24</td>
<td>3.75</td>
</tr>
</tbody>
</table>

Mr. Weaver is an apt comparison to Tommy because their career paths and statistics are very similar. Both pitchers were destined for greatness as soon as they started their first game in

28 Baseball-Reference, supra note 21.
29 Id.
30 See MLB Collective Bargaining Agreement, Article VI(F)§12(a)-(b). pp. 18-19
the majors and both Mr. Weaver and Tommy lived up to the hype. In 2006, Mr. Weaver finished fifth in voting for the AL Rookie of the Year award, while in 2009, Tommy finished third in voting for the NL Rookie of the Year award.\footnote{Baseball-Reference, 2006 Awards, available at: \url{http://www.baseball-reference.com/awards/awards_2006.shtml#ALroy}; Baseball-Reference, 2009 Awards, available at: \url{http://www.baseball-reference.com/awards/awards_2009.shtml#NLroy}}

To date, both Mr. Weaver and Tommy have started over 100 games while consistently winning for their respected clubs. Additionally, the two pitchers rely on their ability to strike out batters in order to record outs, as evidenced by their high SO/9 ratios. Over his career however, Tommy has averaged one more strikeout per nine innings than Mr. Weaver.

Furthermore, over their respective careers both pitchers have given up a fair amount of home runs. However, this is only a recent development for Tommy due to his ineffective curveball in 2012, while Mr. Weaver consistently had problems keeping the ball in the park ever since he arrived in the majors. Mr. Weaver hasn’t had a single season in which he has allowed less than 15 HRs.

Admittedly Mr. Weaver had a mildly more productive platform year than Tommy; however, Tommy was just as valuable to his club, if not more valuable. During his platform year, Tommy received little run support, yet he still won 13 games for the Braves. The Braves scored less than 2 runs in one third of the games that Tommy started in 2012. Nevertheless, Tommy showed a lot of resourcefulness by still managing to pitch over 170 innings. That’s very impressive considering the amount of close ball games the Braves played in 2012. For these reason, Tommy deserves a 2013 salary over the $3.9 million midpoint.
B. Trevor Cahill – 5yrs/$30.5 million ($6.1 million average)

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<tr>
<th></th>
<th>Platform Year</th>
<th>Career Totals</th>
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<tr>
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<td>GS</td>
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<tr>
<td>Hanson</td>
<td>31</td>
<td>13-10</td>
</tr>
<tr>
<td>Cahill</td>
<td>34</td>
<td>12-14</td>
</tr>
</tbody>
</table>

Additionally, Mr. Cahill is another suitable comparison to Tommy. Their platform year statistics are nearly identical. Both started in over 30 games for their respective clubs. Further, Mr. Cahill gave up 9.3 H/9 while Tommy allowed 9.4 H/9, a negligible difference. Additionally, their WHIP and ERAs are very similar. What separates the two however, is Tommy’s ability to strike out batters. During their respective platform years, Tommy struck out nearly two batters more per nine innings than Mr. Cahill. This is important because pitchers usually rely on their ability to strike out batters in order to avoid big innings. While Mr. Cahill recorded a respectable 6.4 SO/9, he is not the strikeout pitcher that Tommy has proven to be.

Likewise, the two players’ career statistics are also nearly identical. While their SO/9 ratios are drastically different over the course of their careers, it is more important to look at the total body of their work. In that respect, Tommy has logged 52 more innings pitched and 12 more games started during his career than Mr. Cahill, before he was arbitration eligible for the first time, hence making him more valuable than Mr. Cahill. Another reason why Tommy deserves to be awarded a salary of $4.3 million is that Mr. Cahill has been inconsistent over the first three years of his career. In 2009, 2010, and 2011, Mr. Cahill recorded an ERA of 4.63, 2.97, and 4.16 respectively. Whereas, Tommy never recorded an ERA higher than 4.00 until this past year and that was due to his back injuries. Arbitration panels have typically awarded players for showing consistency throughout their careers. This hearing should be no different. Tommy is

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a perfect example of consistency during his first three years in the league. For these reasons, Mr. Hanson respectfully requests that this panel award him a 2013 salary of $4.3 million.

VI. **Existence of Physical Defects**

Much has changed with Tommy since August 2011. Tommy missed time late in the 2011 season due to a small rotator-cuff tear.\textsuperscript{35} Although the injury cannot be attributed to one incident, it has been suggested that Tommy’s awkward delivery was likely the problem. After the 2011 season and at the suggestion of Braves Minor League physical therapist Troy Jones, Tommy altered his pitching delivery.\textsuperscript{36} Previously, Tommy’s delivery contained a momentary pause between his windup and delivery which created a snapping-like motion while he pitched.\textsuperscript{37} Tommy has since eliminated that pause.\textsuperscript{38} This change has effectively limited pressure on his throwing arm and has helped reduce frustration with runners stealing against him.\textsuperscript{39}

Additionally, Tommy incurred some minor back pain at the end of the 2012 season.\textsuperscript{40} On July 31, 2012, he was placed on the 15 day disabled list, but, he managed to start 9 games after he came back from that injury.\textsuperscript{41} At his time, Tommy has no physical defects and is entering the 2013 season healthy.

VII. **Recent Performance of the Atlanta Braves**

Despite an early exit from the playoffs, the Braves had a very successful 2012 season. The Braves finished 94-68 and second in their division.\textsuperscript{42} Their performance in 2012 represented encouraging progress from 2011’s dismal finish when the Club blew a 10 ½ game lead (held on

\textsuperscript{35} NBC Sports, supra note 17.
\textsuperscript{37} Id.
\textsuperscript{38} Id.
\textsuperscript{39} Id.
\textsuperscript{40} SB Nation, “Tommy Hanson Injury: Braves Pitcher to Disabled List With Lower Back Pain,” available at: http://atlanta.sbnation.com/atlanta-braves/2012/7/31/3207477/tommy-hanson-injury-atlanta-braves
\textsuperscript{41} Id.
\textsuperscript{42} ESPN, 2012 MLB Standings, available at: http://espn.go.com/mlb/standings
August 26, 2011) over the St. Louis Cardinals for the final playoff spot.\textsuperscript{43} Overall, since Tommy was called up to the majors, the Braves have compiled a 360-288 record and have made two playoff appearances.\textsuperscript{44} This success was built largely upon the Club’s pitching rotation. In 2012, Tommy led that pitching staff in games started and strikeouts.\textsuperscript{45} Furthermore, since 2009, Tommy is second among all Braves’ pitchers in wins; only Tim Hudson has more. Accordingly, Tommy is confident that he has made a positive contribution to the team’s recent success.

VIII. **CONCLUSION**

Tommy is still considered one of the best young arms in the game today. He is only 26 years old but he just finished his fourth year in the big leagues. He is a dependable pitcher who has averaged over 150 IP per season. Furthermore, he has won at least 10 games every year for the Braves. Recently, Tommy has fixed the mechanics that caused most of his past injuries and he remains very optimistic about his future. Looking at his career in a nutshell, Tommy is 45-32 with a 1.25 WHIP and 3.61 ERA. Even with a sub-par performance down the stretch last season, Tommy is a top-of-the-rotation starter. Finally, compared to his peers, most notably Mr. Weaver and Mr. Cahill, he has earned the raise that he seeks. Therefore based on the evidence provided in this brief and in oral argument, Mr. Hanson respectfully requests that this panel find the player’s request of $4.3 million to be an appropriate salary for Mr. Hanson.

\textsuperscript{44} ESPN, supra note 42.