

IN THE MATTER OF A SALARY ARBITRATION
PURSUANT TO THE NATIONAL HOCKEY LEAGUE
COLLECTIVE BARGAINING AGREEMENT

BETWEEN:

CARL GUNNARSSON
Player at Hand

-AND-

THE TORONTO MAPLE LEAFS
Club

BRIEF IN SUPPORT OF CARL GUNNARSSON



TEAM 5

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1. INTRODUCTION & OVERVIEW

[1] This is a matter of an arbitration involving Carl Gunnarsson (“Gunnarsson” or “the Player”) and the Toronto Maple Leafs (“the Maple Leafs” or “the Club”) pursuant to Article 12 of the 2013 Collective Bargaining Agreement (the “CBA”) between the National Hockey League (“NHL”) and the National Hockey League Players’ Association (the “NHLPA”).

[2] The following brief will look at the contributions and fair value of Carl Gunnarsson as a defenseman in the National Hockey League. This brief will specifically address his overall performance in the NHL, durability, offensive and defensive contributions in relation to comparable players, and additional intangible factors that solidify his role as an integral part of the Toronto Maple Leafs hockey club. Based on these criteria, this brief will conclude with a respectful request that the panel find Mr. Gunnarsson is entitled to a salary arbitration award of \$3.5 million per season.

2. OVERALL PERFORMANCE OF THE PLAYER

[3] Gunnarsson is a solid “stay at home” style defender with the ability to log significant minutes for Toronto’s defensive core. He is 6’2, 196 lbs, and was drafted 194th overall in the 7th round of the 2007 NHL entry draft.¹ His consistency and improvement over the course of his first four seasons in the NHL are a testament to both his capabilities and potential, as he has solidified himself as a top-four NHL defenceman. Performance over the duration of Gunnarsson’s career is captured in Table 1 below.

¹ *Ibid.*

Table 1: Career Statistics for Carl Gunnarsson²

Season	GP	G	A	P	+/-	P/G	TOI
2009-2010	43	3	13	16	8	0.35	21: 26
2010-2011	68	4	16	20	-2	0.29	18: 15
2011-2012	76	4	15	19	-9	0.25	21: 42
2012-2013	37	1	14	15	5	0.41	21: 17
Career	224	12	58	70	2	0.325	20.50

[4] In the 2012-2013 shortened NHL season, Gunnarsson helped the Maple Leafs to their first playoff birth in nearly a decade, logging huge minutes and frequently playing on the Club's top defensive pairing with Dion Phaneuf. He averaged an impressive 21:17 minutes on ice per game, which was third on the Maple Leafs and 24th in the National Hockey League.³

[5] Despite his "shut down" type style of play and having only played 37 games, Gunnarsson still contributed offensively. His ability to see the ice and excellent passing capabilities helped him put up 15 points (0.41 points per game), which placed him in a tie for 54th in the NHL.⁴ Further, he managed to maintain a positive plus-minus rating of 5, which is an impressive feat considering his average TOI and role on the first pairing.⁵

[6] If his offensive performance in the 2012-2013 season carries over to the 2013-2014 season, Gunnarsson will be on track for a 33.62 point season. Looking back to the last full NHL season (2011-2012), that point total would likely place him within the top 30 for defensemen in

² <http://mapleleafs.nhl.com/club/player.htm?id=8474125>

³ http://espn.go.com/nhl/statistics/player/_/stat/timeonice/sort/avgTimeOnIce.

⁴ *Supra* note 2.

⁵ *Supra* note 1.

the League.⁶ His offensive contributions are impressive for a “defensive defencemen”, and signal that he is molding into a more holistic player effective at both ends of the rink.

3. SELECTION OF COMPARABLE PLAYERS

[7] In order to properly assess the value of Carl Gunnarsson in the NHL marketplace, it is understandably necessary to evaluate his performance in the league with comparable players.

The most relevant criteria to determine a proper comparison are age, NHL experience, career and platform year statistics, and also each player’s role on their respective teams. It would not be fair to evaluate Gunnarsson’s performance primarily on tangible statistics, as some of his greatest strengths are not quantifiable.

4. COMPARISON TO COMPARABLE PLAYERS⁷

<u>Carl Gunnarsson v Comparable Players Career to Platform Season Statistics</u>								
<u>Player</u>	<u>GP</u>	<u>G</u>	<u>A</u>	<u>PTS</u>	<u>PTS/G</u>	<u>PIM</u>	<u>+/-</u>	<u>TOI</u>
Gunnarsson	224	12	58	70	0.325	58	2	20:50
Quincey	257	18	77	95	0.37	250	-5	21:30
Bogosian	297	34	69	103	0.35	237	-42	21:44

<u>Carl Gunnarsson v Comparable Players Platform Season Statistics</u>							
<u>Player</u>	<u>Year</u>	<u>GP</u>	<u>G</u>	<u>A</u>	<u>PTS</u>	<u>PTS/G</u>	<u>+/-</u>
Gunnarsson	12-13	37	1	14	15	0.41	5
Quincey	11-12	72	7	19	26	0.36	-1
Bogosian	12-13	33	5	9	14	0.42	-5

<u>Carl Gunnarsson v Comparable Player Contracts</u>				
<u>Player</u>	<u>Current Age</u>	<u>Age at Signing</u>	<u>Platform Year</u>	<u>AAV</u>
Gunnarsson	26	26	2012-2013	Unknown
Quincey	28	27	2011-2012	\$3,775, 000
Bogosian	23	23	2012-2013	\$5,142,857

⁶ <http://www.nhl.com/ice/playerstats.htm?season=20112012&gameType=2&team=&position=D&country=&status=&viewName=summary>.

⁷ See www.nhl.com/ice/playerstats; and see www.hockey-reference.com.

A. CARL GUNNARSSON v. KYLE QUINCEY

[8] Kyle Quincey is a 28 year old, 6'2, 207 pound defenseman for the Detroit Red Wings.⁸ He was drafted in the 4th round, 132nd overall by Detroit in the 2003 NHL Entry Draft. In the 2013-2014 NHL Season, Mr. Quincey will make \$3.775 million as part of a two-year deal signed in 2012. Quincey has played 27 more NHL games than Gunnarsson, and was drafted four years earlier which may ordinarily indicate an advantage in experience. However, Gunnarsson has played three full seasons in the Swedish Hockey League (formerly known as Elitserien), and also has competed at the international level for Sweden. Quincey has maintained a slightly higher points per game average (at 0.37) than Gunnarsson (0.325), however Gunnarsson's plus-minus is higher (both career and platform year) and he has taken 192 less career penalty minutes.⁹ The marginal difference between the two players in points per game is outweighed by Gunnarsson's defensive reliability, consistency, and responsibility on the ice.

[9] In terms of durability, Mr. Gunnarsson has had a few minor, reoccurring problems in the past that have kept him out of the Maple Leafs' lineup for brief periods of time. In the 2012-2013 season, he missed 11 games due to a nagging hip injury and 22 games in 2010 due to a hyperextended elbow.¹⁰ Considering the huge minutes that Gunnarsson averages on a consistent basis, he has remained relatively healthy while playing for the Maple Leafs. Quincey, by contrast, has missed a total of 88 games over the course of his career due to a wide variety of injuries.

[10] If Quincey's contract is any indication of what a player of comparable statistics/ratios should be making in the National Hockey League, then it is difficult to suggest that Mr.

⁸ See <http://redwings.nhl.com/club/player.htm?id=8470724>.

⁹ <http://mapleleafs.nhl.com/club/stats.htm?season=20122013>

¹⁰ <http://www.tsn.ca/nhl/teams/players/bio/?id=5218>

Gunnarsson should be compensated less than the \$3.15 million midpoint. Gunnarsson has proven his capability to contribute offensively while taking care of his defensive responsibilities. In the 2012-2013 season, Gunnarsson started his shifts in the defensive zone 60.2% of the time, indicating that the Maple Leafs have heavily relied on him for his shut down capacity.¹¹ In comparison, Quincey started his shifts just 42.4% of the time in his team's own zone, indicating that he is less valuable in terms of shutting down opponent's offensive opportunities.¹²

B. CARL GUNNARSSON v. ZACH BOGOSIAN

[11] Zach Bogosian is a 23 year old, 6'3, 215 pound defenceman, playing for the Winnipeg Jets.¹³ He was drafted much higher than Mr. Gunnarsson, (3rd overall in the 2008 NHL Entry Draft) and is four years younger, however his average points per game and time on ice statistics are comparable. Bogosian has played 73 more games in the NHL, and therefore a direct points comparison would be slightly skewed. He has netted 34 goals and 70 assists in 297 games, yielding 0.35 points per game average. Bogosian is a relatively large NHL defenceman, with an inch and a few pounds on Carl Gunnarsson.

[12] Similar to Mr. Gunnarsson, Bogosian has great hockey sense and can develop plays with smart passes out of his own zone. Bogosian played a limited amount of games in the 2012-2013 NHL season, and had one less point than Gunnarsson in 33 games.

[13] Although their career points per game average and platform year points per game average are very similar, Gunnarsson is much less of a liability in terms of defensive play and on-ice discipline. Bogosian's career plus-minus rating of -42 is significantly poorer than Gunnarsson's

¹¹ http://www.behindthenet.ca/nhl_statistics/CARLGUNNARSSON

¹² Ibid, note 2.

¹³ <http://jets.nhl.com/club/player.htm?id=8474567>

and is perhaps indicative of a weakness in his own zone.¹⁴ An alternative explanation may suggest an uncompetitive team during each season in Bogosian's career. Although this is sometimes a contributing factor, it should be noted that some of Bogosian's defensive teammates finished each season on these "weaker teams" with positive plus minus ratings. Despite this, the Winnipeg Jets have clearly valued his offensive capabilities, average time on ice, and huge upside and considered them critical factors in resigning him.

[14] In terms of Bogosian's durability, he has missed a total of 69 regular season games due to various injuries. Although there is no consistent injury that has plagued him over his career, his aggressive style of play may be a factor of his frequent injuries. The Hockey News stated, "Bogosian needs to pick his spots better when going for hits, and generally play with more discipline..."¹⁵ Gunnarsson, on the other hand, again appears to have significantly more on ice discipline, logging 179 less penalty minutes than Bogosian. As teams place a greater premium on power play opportunities, Gunnarsson has proven his ability to play physically in the defensive zone while staying out of the penalty box. This discipline, without sacrificing physicality, should be considered a huge asset.

[15] Zach Bogosian and Carl Gunnarsson are not perfectly comparable players, as there are some noticeable differences. Bogosian was a highly touted prospect, entered the NHL at a much younger age, is bigger, and has accumulated more games and points than Gunnarsson. However, both players have demonstrated similar competency and consistency in both ends of the ice.

¹⁴ <http://jets.nhl.com/club/player.htm?id=8474567>

¹⁵ <http://forecaster.thehockeynews.com/hockeynews/hockey/player.php?6587>

[16] The Winnipeg Jets have invested in the future of Bogosian and recognize the rarity of a dynamic two-way defenceman in the National Hockey League. Considering the similarities in points per game average, average time on ice, and potential to develop and take on leadership roles on their respective clubs, Gunnarsson and Bogosian should be considered comparable players. Bogosian's salary of \$5,142,857 per season reflects his offensive contributions and role as a top producing defenceman on the Winnipeg Jets defensive core. Similarly, Gunnarsson's comparable experience and performance are a huge asset to the Maple Leafs hockey club and therefore merit an award a greater than \$3.15 million per season.

5. CONCLUSION

[17] Carl Gunnarsson, according to former Toronto Marlies Head Coach, Dallas Eakins, is the type of player that "...goes about his business, makes minimal mistakes, and most importantly...is responsible on the ice."¹⁶ He is a top young NHL defenceman who has been given a lot of responsibility on a relatively young hockey club. He has handled these responsibilities remarkably and his upside potential is limitless. He is an agile puck-moving defenseman who can be relied upon in the defensive zone, contribute offensively, and shut down the best offences in the NHL. Based on an analysis of his performance and assessing the contracts of Gunnarsson's comparables, we respectfully request that the panel award Carl Gunnarson compensation of at least \$3,500,000 for the 2013-2014 NHL season.

¹⁶ <http://www.youtube.com/watch?v=32zQt2CwpoY>