

IN THE MATTER OF A SALARY ARBITRATION

BETWEEN:

DERICK BRASSARD

-AND-

THE NEW YORK RANGERS

BEFORE: NATIONAL ACADEMY OF ARBITRATORS

BRIEF IN SUPPORT OF A COMPENSATION REQUEST FOR DERICK BRASSARD

*Team 15, In House Council
New York, New York*

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I. INTRODUCTION

This brief is in support of The New York Ranger's ("Rangers" or "Club") position in the salary arbitration with Derick Brassard ("Mr. Brassard" or "Player"). This brief will also provide a framework that is capable of awarding appropriate value to Mr. Brassard's offensive contributions to the Rangers. In awarding value to a forward, such as Mr. Brassard's, NHL experience, points per game ("Pts/G") and career goals carry the most weight in appreciating a player's worth to their Club due to his role on the Rangers and what is expected of him. Following this, Mr. Brassard's valuation will consider: overall performance, number of games played, injury history, length of service, and his overall contributions to the Rangers as well as his history outside of the Rangers. Mr. Brassard's will also be objectively compared against two forwards who were arbitration eligible within the last two years by statistical filters with respect to their career-to-platform and platform-seasons to validate his positioning in the NHL marketplace. The salaries of the comparable forwards will frame the narrow range to assign Mr. Brassard's value.

On behalf of the Player, Brassard's, we respectfully submit that \$4,750,00 is an accurate and equitable assessment of his value to the Ranger's for the 2014-2015 season.

II. ABOUT DERICK BRASSARD

Derick Brassard is a 27-year old 6'1", 202lbs forward for the New York Rangers. He was drafted with the 6th overall pick in the 2006 NHL Entry Draft by the Columbus Blue Jackets, and was traded to The Rangers before the 2013 trade deadline.¹

¹ <http://www.nhl.com/ice/player.htm?id=8473544>.

Table 1: Mr. Brassard's career Regular Season statistics:²

| Season | GP | G | A | P | PIM | P/GP | ATOI | Off Zone Start % | Off Zone Finish % |
|--------------|-----|----|-----|-----|-----|------|-------|------------------|-------------------|
| 2007-2008 | 17 | 1 | 1 | 2 | 6 | 0.12 | 9:03 | 72.2 | 56.5 |
| 2008-2009 | 31 | 10 | 15 | 25 | 17 | 0.81 | 14:25 | 63.8 | 51.4 |
| 2009-2010 | 79 | 9 | 27 | 36 | 48 | 0.45 | 14:56 | 63.6 | 49.5 |
| 2010-2011 | 74 | 17 | 30 | 47 | 55 | 0.63 | 17:01 | 60.7 | 50.1 |
| 2011-2012 | 74 | 14 | 27 | 41 | 42 | 0.55 | 16:20 | 50.7 | 47.6 |
| 2012-2013 | 47 | 12 | 17 | 29 | 16 | 0.62 | 16:33 | 47.5 | 50.9 |
| 2013-2014 | 81 | 18 | 27 | 45 | 46 | 0.55 | 15:47 | 60.1 | 50.8 |
| Career Total | 403 | 81 | 144 | 225 | 230 | 0.56 | - | - | - |

****Indicates Platform Season**

Throughout his professional career Mr. Brassard has produced good statistics, but has not shown considerable growth since the 2010-2011 season. He has never had the breakout season that could reveal hidden potential or the ability to elevate his game to a new level. Whether Mr. Brassard played on a playoff team, or on a team that is near the bottom of the league he has had roughly the same statistics.

Mr. Brassard from the 2009-2010 season to the 2013-2014 season has been consistent in his offensive output, alternating between 0.63 P/GP at the high end, and 0.55 P/GP on the low end, establishing himself as a productive, but not phenomenal top-6 forward in the league.³

When looking at what situations Mr. Brassard is played in by his coaches we can see that through out his career he has received a significantly higher percentage of his starts in the offensive zone. Other than the 2012-2013 season Mr. Brassard has finished less plays in the offensive zone than started them. Indicating offensive pressure is forfeited and puck possession was turned over.⁴ Mr. Brassard can be a more valuable

² Supra note 1, <http://www.nhl.com/ice/player.htm?id=8473544&view=splits>; Off zone %'s can be found at http://www.behindthenet.ca/nhl_statistics.php?c=0+1+3+5+4+6+7+8+13+14+29+30+32+33+34+45+46+63+67&ds=1&f3=DERICKBRASSARD&f1=2013_s+2013_p+2012_s+2012_p+2011_s+2010_s+2009_s+2008_s+2007_s

³ Supra note 1

⁴ Supra note 3

asset to the Club, if he capitalized on the offensive situations that the Club frequently put him in, and on a more consistent basis.

Table 2: Mr. Brassard's Platform Season Statistics, 2010-2011⁵

| Season | GP | G | A | P | PIM | P/GP | ATOI | Off Zone Start % | Off Zone Finish % |
|-----------|----|----|----|----|-----|------|-------|------------------|-------------------|
| 2013-2014 | 81 | 18 | 27 | 45 | 46 | 0.55 | 15:47 | 60.1 | 50.8 |

Playing for the New York Rangers during his platform season Mr. Brassard demonstrated the consistency in his offensive output, but again failed to dramatically improve his offensive or defensive play. The 2013-2014 season saw Mr. Brassard's points per game and offensive zone start, compared to finish percent, regress. Further, his points per game went down from 0.62 to 0.55, additionally a season earlier Mr. Brassard would consistently finish more plays in the offensive zone than he began there. Showing a drop in ability to finish or produce finishing plays. His platform season also saw a drop in Mr. Brassard's average time on ice by 0:46 per game. Which can be indicative of a loss of faith by the coaching staff.

The 2013-2014 season demonstrates that Mr. Brassard can be a valuable member of a team, but lacking any substantial improvement, the club views Mr. Brassard as a high value complementary player.

III. COMPARABLE PLAYERS

Very few forwards, and none in a comparable position to Mr. Brassard, have gone through the arbitration process to completion in recent years. Instead many players who would have gone through the arbitration process have signed contracts either prior to the

⁵ Supra note 1, supra note 3

hearing or announcement of the decision that includes a term of longer than one or two years.

The selection of objective search filters allows for a more comprehensive comparison of a forward's offensive characteristics. The objective filters that are employed are based both on, career-to-platform statistics and platform-season statistics which are as follows: Age +/- 2-years; games played +/- 25%; and career goals +/- 25%. Given this state of affairs, the closest comparable players available to assess a fair and reasonable SPC (standard player contract) for Mr. Brassard are Chris Stewart, David Krejci.

Table 3-Cap Hit Comparables

| Player | Cap Hit | Contract Start Date |
|------------------------|----------------|----------------------------|
| Chris Stewart | 4,150,000 | 2013 |
| Derick Brassard | 4,750,000 | Arbitration |
| David Krejci | 5,250,000 | 2012 |

A. Chris Stewart

Chris Stewart is a 26-year old forward currently playing for the Buffalo Sabres. Drafted by the Colorado Avalanche 18th overall in the 2006 NHL Entry Draft, Mr. Stewart played for Colorado from 2008 until he was traded mid-season to the St. Louis Blues during the 2010-2011 season, where he played until he was traded mid-season to the Buffalo Sabres in 2013-2014. As a comparable player the analysis of Mr. Stewart will not go past the 2012-2013 season.

Table 4: Mr. Brassard and Mr. Stewart – Career Statistics:⁶

| Player | GP | G | A | P | PIM | P/GP |
|------------------------|-----------|----------|----------|----------|------------|-------------|
| Derick Brassard | 403 | 81 | 144 | 225 | 230 | 0.56 |
| Chris Stewart | 382 | 115 | 113 | 228 | 447 | 0.60 |

Both Mr. Brassard and Mr. Stewart were drafted in the 2006 NHL Entry Draft and had played for two different teams, as the result of a mid-season trade, before they became eligible for salary arbitration pursuant to s 12 of the NHL Collective Bargaining Agreement (“CBA”). Additionally both have produced a similar amount of points since their first year in the NHL. There are some clear differences between these two players, such as size as Mr. Stewart is an inch taller and approximately 20 pounds heavier, but the similarities and reliance on point production outweigh these differences and make them comparable players. Mr. Stewart, while having a bigger body, has produced better average statistics over his career. He has generated 228 points in 382 games, which equates to 0.60 points per game averaged over his career. Mr. Stewart also gets paid considerably less than what Mr. Brassard is asking for despite his size advantage and higher output.

Table 5: Mr. Brassard and Mr. Stewart – Platform Season Statistics:⁷

| Player | GP | G | A | P | PIM | P/GP | ATOI | Off Zone Start % | Off Zone Finish % |
|------------------------|-----------|----------|----------|----------|------------|-------------|-------------|-------------------------|--------------------------|
| Derick Brassard | 81 | 18 | 27 | 45 | 46 | 0.55 | 15:47 | 60.1 | 50.8 |
| Chris Stewart | 48 | 18 | 18 | 36 | 40 | 0.75 | 15:49 | 54.6 | 51.2 |

⁶ Supra note 1;

<http://www.nhl.com/ice/player.htm?id=8473485&docid=TeamPlayerBio:46804#&navid=nhl-search>

⁷ Supra note 1; supra note 7; For Chris Stewart ATOI

<http://www.nhl.com/ice/player.htm?id=8473485&view=splits&season=20122013&gameType=2>; for offensive start/finish %

http://www.behindthenet.ca/nhl_statistics.php?c=0+1+3+5+4+6+7+8+13+14+29+30+32+33+34+45+46+63+67&ds=1&f3=CHRISSTEWART&f1=2013_s+2012_s+2012_p+2011_s+2011_p+2010_s+2009_s+2009_p+2008_s

Mr. Stewart's platform season was the lockout shortened 2012-2013 season, in which he played every game of the season as a member of the St. Louis Blues. It is here where we can see a large divergence between the two with Mr. Stewart producing 36 points in 48 games for an average 0.75 points per games played. While performing at this pace Mr. Stewart was also playing on average 1:12 less per game, which means that not only did Mr. Stewart outpace Mr. Brassard on average points per game, but he was scoring at a more efficient rate during his platform season.

Mr. Stewart is also less prone to losing possession after starting in the offensive zone as indicated by his offensive zone-finishing statistic. This indicates a superior ability to maintain pressure upon opposing team's defenses.

Mr. Stewart for producing roughly similar offensive numbers to Mr. Brassard, while being a larger body, signed a 2-year contract with the St. Louis Blues in the summer of 2013 at an average annual value of \$4,150,000. This is lower than the salary the New York Rangers are willing to give Derick Brassard in recognition of Mr. Brassard's positive playoff performances, consistent offensive output, being penalized less frequently, and reflecting the superior value that centers have to NHL teams.

B. David Krejci

David Krejci is a 28-year old forward with the Boston Bruins. Drafted 63rd overall by the Boston Bruins in the 2004 NHL Entry Draft, he has played his entire career with the same team. Mr. Krejci was arbitration eligible in the 2012 off-season and signed a 3-year contract at an average annual value of \$5,250,000, as such for the purpose of this analysis Krejci's statistics will only be looked at until the end of the 2011-2012 season.

Table 6: Mr. Brassard and Mr. Krejci – Career Statistics⁸

| Player | GP | G | A | P | PIM | P/GP |
|------------------------|-----------|----------|----------|----------|------------|-------------|
| Derick Brassard | 403 | 81 | 144 | 225 | 230 | 0.56 |
| David Krejci | 377 | 81 | 195 | 276 | 138 | 0.73 |

Mr. Krejci and Mr. Brassard were drafted two-years apart, are within 1” of each other in height and are the second line playmaking centers on their respective teams.

Throughout their careers both players have an equal number of goals. Mr. Krejci represents the high end of Mr. Brassard’s potential salary and is a comparable player to demonstrate why his contract ought not to be valued over \$5,000,000.

David Krejci has played 26 less games in his career, however in that time he has generated 51 more assists, and an equal number of goals; which averages out to 0.17 more points per games played than Mr. Brassard. He has also done this while serving 92 less penalties in minutes, meaning that he has caused his team to suffer numbers disadvantages for a combined 1.5 games less than Mr. Brassard.

Table 7: Mr. Brassard and Mr. Krejci – Platform Season Statistics⁹

| Player | GP | G | A | P | PIM | P/GP | ATOI | Off Zone Start % | Off Zone Finish % |
|------------------------|-----------|----------|----------|----------|------------|-------------|-------------|-------------------------|--------------------------|
| Derick Brassard | 81 | 18 | 27 | 45 | 46 | 0.55 | 15:47 | 60.1 | 50.8 |
| David Krejci | 79 | 23 | 39 | 62 | 36 | 0.78 | 18:25 | 53.7 | 50.9 |

⁸ Supra note 1;

<http://www.nhl.com/ice/player.htm?id=8471276&docid=TeamPlayerBio:3435#&navid=nhl-search>

⁹ Supra note 1; supra note 10, supra note 2; for offensive zone start stats:

http://www.behindthenet.ca/nhl_statistics.php?c=0+1+3+5+4+6+7+8+13+14+29+30+32+33+34+45+46+63+67&ds=1&f3=DAVIDKREJCI&f1=2013_s+2013_p+2012_s+2012_p+2011_s+2011_p+2010_s+2010_p+2009_s+2009_p+2008_s+2008_p+2007_s+2007_p

Mr. Krejci's platform season was statistically better by every metric, except games played. During his platform season David Krejci played 2 less games but scored 5 more goals, had 12 more assists, and took 10 less minutes of penalties.

Additionally Mr. Krejci's offensive zone start compared to finish percentage showed that while he had a net negative offensive zone finish percent (compared to starts) and was worse than his career norm, was not as bad as Mr. Brassard's. Mr Krejci's role is very similar to that of Mr. Brassard, and both are playing on perennial playoff teams now; however, the Club puts forward that Mr. Krejci's integral role in winning the Stanley cup during his platform season, and playoff performance also helps account for the 5.25 million dollars contract awarded to Mr. Krejci.

Mr. Krejci is statistically superior to Mr. Brassard in almost every way. The Club respectfully puts forward that it would be disproportionate to award Mr. Brassard a contract within \$250,000 of Mr. Krejci's fairly valued contract.

IV. CONCLUSION

This brief has assessed Mr. Brassard's value with respect to his overall career performance and his overall contributions to the Club. It has identified two comparable players to best frame the current market value. The head-to-head comparisons demonstrate the appropriate range in which to place Mr. Brassard. In consideration of the totality of Mr. Brassard's contributions leading up to this arbitration, it is respectfully submitted that the compensations request of 4,750,000 be granted for being an accurate assessment of what Mr. Brassard is worth for the 2014-2015 season.