

**IN THE MATTER OF SALARY ARBITRATION BETWEEN:**

**LARS ELLER**

**-AND-**

**THE MONTREAL CANADIENS**

**SUBMISSION ON BEHALF OF LARS ELLER**

**TEAM 21**

I. INTRODUCTION AND OVERVIEW.....	1
A. Trend of Offensive Improvement and Strong Playoff Performance.....	1
B. Defensive Role and Physical Presence.....	2
C. Pressure Performer.....	4
II. VALID COMPARABLE PLAYERS.....	5
A. David Desharnais – Montreal Canadiens.....	5
B. Patrik Berglund – St. Louis Blues.....	6
III. CONCLUSION.....	8

## **I. INTRODUCTION AND OVERVIEW**

This brief will examine Lars Eller's performance record for the Montreal Canadiens, in conformity with section 12.9 of the NHL Collective Bargaining Agreement.<sup>1</sup> Mr. Eller is a forward who demonstrates excellent point-producing potential, consistently contributes to his team's physical play, and performs exceedingly well in high-pressure situations. Moreover, an analysis of Mr. Eller's salary in comparison to similar players will reveal that he should be entitled to an increase beyond the \$3.5 million midpoint figure.<sup>2</sup> Accordingly, we submit that Mr. Eller should be awarded \$3.75 million per season in this arbitration.

### **A. Trend of Offensive Improvement and Strong Playoff Performance**

Mr. Eller's offensive performance for the Canadiens has generally followed an upward trend. In the 2010-2011, 2011-2012 and 2012-2013 seasons, his points-per-game ("PPG") numbers were 0.22, 0.35 and 0.65 respectively.<sup>3</sup> This type of improvement has also been reflected in the role he plays for Montreal's lineup, with his time on ice ("TOI") increasing from 11:08 in 2010-2011 to 15:57 in 2013-2014.<sup>4</sup> This positive trend of offense illustrates Mr. Eller's strong and continuing contributions to the Canadiens' lineup.

Moreover, Mr. Eller has been a major offensive contributor to his team's playoff performance. In the Canadiens' 2013-2014 playoff run, he registered an impressive PPG number of 0.76.<sup>5</sup> With a total of 13 points, this offensive success made Mr. Eller the 2<sup>nd</sup> highest point producer of the team's 2013-2014 playoff run, trailing only one point behind P.K. Subban.<sup>6</sup>

---

<sup>1</sup> NHL Collective Bargaining Agreement, 2012, s.12.

<sup>2</sup> <http://capgeek.com/player/998>

<sup>3</sup> <http://www.nhl.com/ice/playerstats>

<sup>4</sup> *Ibid.*

<sup>5</sup> *Ibid.*

<sup>6</sup> <http://www.nhl.com/ice/teamstats>

Mr. Eller's PPG ratio decreased somewhat to 0.34 in the 2013-2014 regular season, reflecting the team's offensive output as a whole.<sup>7</sup> In 2012-2013, the Canadiens placed 4<sup>th</sup> in the league in goals-per-game with 3.04 goals.<sup>8</sup> The next season, the team's offensive output fell to 21<sup>st</sup> in the league with 2.55 goals-per-game.<sup>9</sup> In fact, the Canadiens were outshot on average in the 2013-2014 season, with 31 shots against and 28.4 shots for per game.<sup>10</sup> Given the Canadiens were outshot and produced less goals per game – and still managed to finish 4<sup>th</sup> in the Eastern Conference – their success is attributable to factors supplementing their modest goal-scoring. For example, the Canadiens' goals-against average would also decrease significantly from 2012-2013 to this past season, with a drop from 2.58 to 2.45 in goals allowed (propelling them from 14<sup>th</sup> to 8<sup>th</sup> in the league overall).<sup>11</sup> Simultaneously, the team led the league in blocked shots. In the 2012-2013 season the Canadiens placed 14<sup>th</sup> in the league in blocked shots; in 2013-2014, the Canadiens were 1<sup>st</sup> overall with 1491 blocked shots total, an average of 18.2 per game.<sup>12</sup> The Canadiens also made a strong showing in shorthanded play: the team's penalty killing efficiency was ranked 4<sup>th</sup> in the league in 2013-2014, compared to an abysmal 23<sup>rd</sup> place in the previous year.<sup>13</sup> In short, the Canadiens of 2013-2014 have exemplified a style of play less reliant solely on offense and more contingent on well-rounded players – which is tantamount to Mr. Eller's role on the team and added physical presence.

## **B. Defensive Role and Physical Presence**

Although he has always demonstrated strong defensive and physical performance, Mr. Eller's value to the team in this regard was indispensable in the 2013-2014 regular season and

---

<sup>7</sup> *Ibid.*

<sup>8</sup> *Ibid.*

<sup>9</sup> *Ibid.*

<sup>10</sup> *Ibid.*

<sup>11</sup> *Ibid.*

<sup>12</sup> *Ibid.*

<sup>13</sup> *Ibid.*

playoffs – especially considering the Canadiens’ approach towards well-rounded play, as described earlier. In the regular season, he recorded an impressive total of 130 hits, which compares favourably to his fellow linemates’ totals of 110 for Alex Galchenyuk and 38 for Brendan Gallagher.<sup>14</sup> Mr. Eller’s total of 130 hits made him the highest-hitting centre and forward on the team by far, with Travis Moen coming in second with only 92 hits.<sup>15</sup> This physical play continued into the 2013-2014 playoffs, with Mr. Eller registering 30 hits – the most of any centre on the team.<sup>16</sup>

Mr. Eller’s increasingly physical and defensive role is also illustrated by the number of shots he blocked in 2013-2014. He recorded 58 blocks – the most of any forward on the Canadiens and the 15<sup>th</sup> highest of any centre in the league.<sup>17</sup>

Finally, Mr. Eller’s role as a more defensive offenceman can be ascertained from his relatively low powerplay time on ice per game, and higher penalty kill time. In the 2013-2014 season, he averaged only 1:06 on the powerplay, while his linemates Mr. Gallagher and Mr. Galchenyuk had 2:26 and 2:06 respectively.<sup>18</sup> This significantly reduced role on the powerplay compared to his teammates meant less opportunity was afforded for Mr. Eller to capitalize on advantageous offensive situations and shows the value the team placed on his defensive and physical play at even strength. Conversely, while Mr. Eller contributed an average of 1:24 minutes per game to the Canadiens penalty kill, his linemates Mr. Gallagher and Mr. Galchenyuk played virtually no penalty kill time, at 0:04 and 0:01 respectively.<sup>19</sup>

---

<sup>14</sup> <http://www.nhl.com/ice/playerstats>

<sup>15</sup> <http://www.nhl.com/ice/teamstats>

<sup>16</sup> <http://www.nhl.com/ice/playerstats> ; <http://www.nhl.com/ice/teamstats>

<sup>17</sup> *Ibid.*

<sup>18</sup> <http://www.nhl.com/ice/playerstats>

<sup>19</sup> *Ibid.*

Mr. Eller's physical and defensive record in 2013-2014 typifies his shifting role as a centre. His 130 blocks in 2013-2014 represents a stunning increase over his last full-length season number of 72 hits in 2011-2012. Moreover, Mr. Eller's 58 blocks in 2013-2014 was also an improvement from his 55 blocks in 2011-2012.<sup>20</sup>

The team's increasingly defensive style play in 2013-2014 reflects Mr. Eller's slightly decreased point production in this season. His increased focus on contributing to the Canadiens' physical and defensive repertoire meant a shift away from his offensive role of previous years. As Mr. Eller becomes more accustomed to this new role, his point production will stabilize to match the trend he established in previous seasons. Indeed, in the 2013-2014 playoffs, Mr. Eller had already harmonized his physical presence and offensive role by recording 30 hits while also being the team's second highest points producer with an average of 0.76 points per game.<sup>21</sup>

### **C. Pressure Performer**

Mr. Eller has proven himself as a player who performs well under pressure and can lead the team to success in tough situations. In the 2013-2014 season, all but one goal that Mr. Eller scored occurred while the Canadiens were either tied or trailing.<sup>22</sup> Moreover, he scored three game-winning goals in the regular season.<sup>23</sup> Mr. Eller has also proven effective for the Canadiens in penalty shots. In this same season, he scored on three out of four attempts.<sup>24</sup> In one game where he was selected for the shootout, Mr. Eller scored the lone goal on either team, winning the game for Montreal against Tampa Bay.<sup>25</sup> The four-win difference provided by Mr. Eller meant an extra 7 points for the team in the 2013-2014 regular season; to put Mr. Eller's

---

<sup>20</sup> *Ibid.*

<sup>21</sup> *Ibid.*

<sup>22</sup> *Ibid.*

<sup>23</sup> *Ibid.*

<sup>24</sup> *Ibid.*

<sup>25</sup> <http://www.ctvnews.ca/sports/nhl-recap-habs-beat-lightning-in-shootout-oilers-fall-to-flyers-4-3-1.1610696>

contribution into perspective with respect to a competitive playoff race, the Canadiens finished 4<sup>th</sup> in the Eastern Conference with 100 points, while the 7<sup>th</sup> and 8<sup>th</sup> place teams had 93 points each.<sup>26</sup>

The Canadiens also benefit from Mr. Eller's superior faceoff performance in pressure situations. Out of 979 faceoff attempts in the 2013-2014 regular season, he won 521 - for a faceoff win percentage of 53.2%.<sup>27</sup> This ranks Mr. Eller as the number one player on the team for faceoff win percentage, aside from players who made ten attempts or less.<sup>28</sup> Mr. Eller's ability to score when it counts and win critical faceoffs illustrates his overall value to the team as a well-rounded forward.

## **II. VALID COMPARABLE PLAYERS**

### **A. David Desharnais – Montreal Canadiens:**

Mr. Eller submits that he is a comparable player to his Montreal Canadiens teammate David Desharnais, who earned a midpoint salary of \$3.5 million after his platform year of 2012-2013.<sup>29</sup> Both Mr. Eller and Mr. Desharnais are centres on the same team and currently earn the same midpoint salary. However, while Mr. Desharnais has proven himself as a point contributor, he does not fill the same diverse role for the team that Mr. Eller does.

Mr. Desharnais and Mr. Eller recorded a similar number of points in the shortened 2012-2013 season with 28 and 30 respectively.<sup>30</sup> However, Mr. Desharnais' record in the playoffs has been unremarkable – in the 2012-2013 playoff run, he recorded only one point in five games.<sup>31</sup> Mr. Eller, on the other hand, contributed 13 points over 17 games during Montreal's playoff run

---

<sup>26</sup> <http://www.nhl.com/ice/standings>

<sup>27</sup> <http://www.nhl.com/ice/playerstats>

<sup>28</sup> <http://www.nhl.com/ice/teamstats>

<sup>29</sup> <http://capgeek.com/player/98>

<sup>30</sup> <http://www.nhl.com/ice/playerstats>

<sup>31</sup> *Ibid.*

in his platform season of 2013-2014.<sup>32</sup> While this made Mr. Eller the second-highest playoff point contributor for Montreal in 2013-2014, Mr. Desharnais was only the 9<sup>th</sup> highest point scorer in his platform year.<sup>33</sup>

Moreover, Mr. Desharnais does not strengthen Montreal's physical and defensive efforts to nearly the same extent as Mr. Eller. For example, in the 2012-2013 regular season, Mr. Desharnais only recorded 26 hits and 18 blocks, compared to Mr. Eller's 86 hits and 33 blocks.<sup>34</sup> As discussed above, Mr. Eller's physical record improved even further in the 2013-2014 season, with 130 hits and 58 blocks.<sup>35</sup> Mr. Desharnais' virtually exclusively offensive role renders his contributions to the team one-dimensional in comparison with the diverse offensive, defensive and physical play displayed by Mr. Eller.

Accordingly, due to Mr. Eller's more diverse contributions to the team, we submit that he should be entitled to a salary higher than the \$3.5 million midpoint earned by Mr. Desharnais.<sup>36</sup> An award of \$3.75 million per year would be more just based on his more well-rounded contributions to the Montreal roster.

#### **B. Patrik Berglund – St. Louis Blues:**

Mr. Eller submits that he is a comparable player to Patrik Berglund of the St. Louis Blues, who earns a midpoint salary of \$3.7 million.<sup>37</sup> Mr. Eller and Mr. Berglund are both centres, were drafted in 2007 and 2006 respectively, and perform similar roles for their teams.<sup>38</sup>

In the 2013-2014 season, Mr. Berglund scored 14 goals and contributed 18 assists, for a total of 32 points.<sup>39</sup> This is only marginally higher than Mr. Eller's 12 goals, 14 assists and 26

---

<sup>32</sup> *Ibid.*

<sup>33</sup> <http://www.nhl.com/ice/teamstats>

<sup>34</sup> <http://www.nhl.com/ice/playerstats>

<sup>35</sup> *Ibid.*

<sup>36</sup> <http://capgeek.com/player/98>

<sup>37</sup> <http://capgeek.com/player/964>

<sup>38</sup> <http://www.nhl.com/ice/playerstats>



points for the same season. However, Mr. Berglund has not shown a trend of improvement in recent seasons. From the 2010 through 2014 seasons, Mr. Berglund's PPG were 0.64, 0.46, 0.52, and 0.41 respectively.<sup>40</sup> While Mr. Berglund's best season in terms of PPG was 2010-2011, Mr. Eller's strongest regular season in the same regard was much more recent with 0.65 PPG in 2012-2013.<sup>41</sup>

Moreover, Mr. Eller's most effective playoff run was the most recent, in 2013-2014, with a PPG of 0.76.<sup>42</sup> Mr. Berglund, on the other hand, failed to contribute to his team's playoff run this year at all. In the four games he played in the playoffs last year, Mr. Berglund failed to record a single point.<sup>43</sup> In fact, he only registered 9 shots, and left the playoffs with a plus-minus ranking of -7.<sup>44</sup> Conversely, Mr. Eller was a key component of his team's playoff success in 2013-2014, with a contribution of 13 points, 23 shots and an overall plus/minus rating of +6.<sup>45</sup>

While Mr. Berglund does contribute to his team's physical play, he is a less physical player than Mr. Eller. In the 2013-2014 season, Mr. Berglund recorded 88 hits and 30 blocks.<sup>46</sup> Mr. Eller, as discussed above, contributed 130 hits and 58 blocks - making him one of the most important components of Montreal's physical play.<sup>47</sup>

Finally, Mr. Eller has a much stronger record than Mr. Berglund in high-pressure situations. On the faceoff, for example, Mr. Eller had a 53.2% win rate as discussed above, compared to Mr. Berglund's 47.6%.<sup>48</sup> Mr. Berglund's scoring was also concentrated in games

---

<sup>39</sup> *Ibid.*

<sup>40</sup> *Ibid.*

<sup>41</sup> *Ibid.*

<sup>42</sup> *Ibid.*

<sup>43</sup> *Ibid.*

<sup>44</sup> *Ibid.*

<sup>45</sup> *Ibid.*

<sup>46</sup> *Ibid.*

<sup>47</sup> *Ibid.*

<sup>48</sup> *Ibid.*

where his team was already leading – 8 out of his 14 total goals.<sup>49</sup> In contrast, all but one of Mr. Eller's 12 goals came when his team was either tied or trailing, meaning his offensive performances made much more of a contribution to his team's success in recording wins.<sup>50</sup>

While Mr. Eller and Mr. Berglund are comparable players, Mr. Eller submits that his more significant contributions to his team's overall physical repertoire and playoff performance entitle him to a higher salary than the \$3.7 million midpoint that Mr. Berglund earns.<sup>51</sup> A slightly higher salary of \$3.75 million per year would be fair in comparison to Mr. Berglund.

### **III. CONCLUSION**

Mr. Eller fills a unique and indispensable physical role for the Montreal Canadiens. He has proven to be one of the most physical forwards on the team, and has contributed positively to his team's performance in the most important situations. Certainly, with the second-highest number of points recorded for Montreal in the 2013-2014 playoffs, Mr. Eller has proven himself as a diverse forward who is critical to both the offensive and defensive success of the team. Moreover, when comparing his overall performance to players earning an equal or higher salary, Mr. Eller's record reveals a more complete forward who produces team-leading physical statistics. Accordingly, Mr. Eller submits that a midpoint salary of \$3.75 million is appropriate and just given his physical role, coupled with a well-rounded offensive and defensive performance in critical situations.

---

<sup>49</sup> *Ibid.*

<sup>50</sup> *Ibid.*

<sup>51</sup> <http://capgeek.com/player/964>