

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

**LARS ELLER**

**-AND-**

**THE MONTREAL CANADIENS**

**BRIEF OF THE MONTREAL CANADIENS**

**Team 27**



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## **I. INTRODUCTION AND OVERVIEW**

This brief discusses and analyzes the contributions of Lars Eller (“Mr. Eller”) of the Montreal Canadiens pursuant to Section 12.9 of the NHL Collective Bargaining Agreement.<sup>1</sup> While Mr. Eller is a valued member of the Canadiens, his demonstrably weak platform year, his lack of career offensive production and his inability to emerge as a top-six forward support a finding that his value is significantly below that of the \$3.5 million midpoint. The Canadiens’ respectfully submit that Mr. Eller warrants an award of a one-year contract at a value of \$3.1 million.

### **A. WEAK PLATFORM YEAR PRODUCTION**

Mr. Eller significantly underperformed during the 2013-2014 season (the “Platform Year”), and showed signs of regression in his development. Mr. Eller failed to produce to the expected standard offensively, producing at a paltry 0.34 points per game rate, a nearly 50% decrease from his production during the lockout shortened 2012-2013 season. This decrease came despite Mr. Eller recording a career high in average ice time per game and playing on average one minute more per game in the Platform Year than in 2012-2013. While Mr. Eller is regarded as a two-way player, he was also a defensive liability during the Platform Year, finishing last amongst Canadiens forwards in plus-minus (-15).<sup>2</sup>

Mr. Eller’s poor offensive numbers are only exacerbated when compared to those of his NHL counterparts. Mr. Eller finished 87<sup>th</sup> in goals amongst NHL centremen, 105<sup>th</sup>

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<sup>1</sup> NHL Collective Bargaining Agreement, 2013, <[http://cdn.agilitycms.com/nhlpacom/PDF/NHL\\_NHLPA\\_2013\\_CBA.pdf](http://cdn.agilitycms.com/nhlpacom/PDF/NHL_NHLPA_2013_CBA.pdf)>.

<sup>2</sup> NHL.com, <<http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=2>>.

in assists and 102<sup>nd</sup> in points despite finishing 84<sup>th</sup> in average time on ice per game.<sup>3</sup> Despite averaging over one minute of powerplay time per game, Mr. Eller recorded just three powerplay points in 77 games.<sup>4</sup>

At 6'2 and 215lbs, Mr. Eller all of the physical attributes necessary to thrive at the NHL level. Despite these advantages, Mr. Eller has failed to emerge as a dominant two way player, with TSN noting that he “[m]ust continue gaining more strength to better handle bigger defenders and the rigors of the National Hockey League.”<sup>5</sup> Mr. Eller’s marked statistical regression, poor play and ineffective use of his physical attributes represent compelling evidence in support of

## **B. DISSAPOINTING CAREER PRODUCTION**

The Montreal Canadiens are deeply concerned that Mr. Eller’s regression during the Platform Year is indicative of return to his career statistical averages. As shown in Table 1.1, Mr. Eller produced underwhelming totals in each of the 2010-2011, 2011-2012, and 2013-2014 seasons.<sup>6</sup> While he produced well in the 2012-2013 season and the 2014 Stanley Cup Playoffs, these limited flashes of production should not overwhelm three full seasons of underperformance. Instead, such instances are properly understood as aberrations that only add to the disappointment and frustration experienced as a result of Mr. Eller’s struggles.

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<sup>3</sup>NHL.com, <<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142ALLCACALL&viewName=summary&sort=avgTOIPerGame&pg=3>>.

<sup>4</sup> NHL.com, “Lars Eller, Splits”, <<http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=2>>.

<sup>5</sup> <http://www.tsn.ca/nhl/player-bio/lars-eller/bio>

<sup>6</sup> NHL.com, “Lars Eller, Stats”, <<http://www.nhl.com/ice/player.htm?id=8474189&view=stats>>.

Table 1.1 – Lars Eller Career Statistics<sup>7</sup>

SEASON	TEAM	GP	G	A	P	+/-	PIM	PPG	SHG	GWG	S	S%
2009-2010	BLUES	7	2	0	2	2	4	1	0	0	8	25.0
2010-2011	CANADIENS	77	7	10	17	-4	48	0	0	2	79	8.9
2011-2012	CANADIENS	79	16	12	28	-5	66	2	2	2	129	12.4
2012-2013	CANADIENS	46	8	22	30	8	45	1	0	1	84	9.5
2013-2014	CANADIENS	77	12	14	26	-15	68	2	1	3	137	8.8
2014-2015	CANADIENS	1	0	0	0	-1	0	0	0	0	2	0.0
	NHL TOTALS	287	45	58	103	-15	231	6	3	8	439	10.3

Mr. Eller is also inconsistent, and has demonstrated tremendous difficulty in adapting to new situations. Beginning the Platform Year on a line with Alex Galchenyuk and Brendan Gallagher, Mr. Eller produced four goals and six points in Montreal’s first three games. His production then stalled, and Montreal resorted to moving him around the lineup in an attempt to spark his production. During this time, Mr. Eller became mired in a 24 game streak in which he produced just one point.<sup>8</sup> Mr. Eller has spoken to such difficulties, admitting: “I think the No. 1 one thing for me is consistency. I want to improve every area, but most of all consistency”.<sup>9</sup>

### C. LACK OF MATURITY, DISCIPLINE AND LEADERSHIP QUALITIES

Mr. Eller demonstrated a lack of maturity during the Platform Year with respect to his interactions with media. In October 2013, Mr. Eller made comments to the Canadian Press that accused the Edmonton Oilers of playing “a little bit like a junior team,” comments which infuriated the organization and provoked a response from Edmonton coach Dallas Eakins.<sup>10</sup> Edmonton further responded with a victory over the

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

<sup>8</sup> <http://www.nhl.com/ice/news.htm?id=727112>

<sup>9</sup> <http://www.nhl.com/ice/news.htm?id=727112>

<sup>10</sup> “Lars Eller’s ‘junior team’ comments about Edmonton Oilers too juicy for media to resist” National Post (October 24, 2013) <<http://sports.nationalpost.com/2013/10/24/lars-ellers-junior-team-comments-about-edmonton-oilers-too-juicy-for-media-to-resist/>>.

Canadiens on October 22<sup>nd</sup>, and credited Mr. Eller for inspiring the win. The comments attracted a swarm of negative publicity, with the National Post reporting “Loudmouth Lars...did not appear for interviews after the game.”<sup>11</sup> Mr. Eller has also demonstrated a marked lack of discipline and maturity on the ice, recording the fourth highest penalty minute total on the Canadiens during the Platform Year – with 68 total penalty minutes – while finishing second in total minor penalties taken with 28.<sup>12</sup> Mr. Eller does not meet the expected standard for professionalism in the NHL, and his recklessness on and off the ice has negatively impacted the Montreal Canadiens.

Mr. Eller has failed to develop into a meaningful leader on the Canadiens. During the Platform Year, Mr. Eller recorded zero points in 20 games against the NHL’s top nine teams, and only nine points in 44 games against the NHL’s top 18 teams.<sup>13</sup> Nearly 2/3<sup>rd</sup>s of Mr. Eller’s already disappointing production came against the NHL’s lowest ranked teams, further demonstrating his failure to distinguish himself as a difference-maker for the Canadiens’ organization.

## **II. COMPARABLE PLAYERS**

Montreal submits that the appropriate comparable players for Mr. Eller are Mats Zuccarello and Chris Kreider, both of the New York Rangers – an Eastern Conference team that, like Montreal, spends to the NHL salary cap limit. Both players were

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<sup>11</sup> “Lars Eller’s ‘junior team’ comments about Edmonton Oilers too juicy for media to resist” National Post (October 24, 2013) <<http://sports.nationalpost.com/2013/10/24/lars-ellers-junior-team-comments-about-edmonton-oilers-too-juicy-for-media-to-resist/>>.

<sup>12</sup> NHL.com, “Montreal Canadiens, 2013-2014” <<http://www.nhl.com/ice/playerstats.htm?fetchKey=20142MTLFAFALL&sort=minorPenalties&viewName=penalties>>.

<sup>13</sup> NHL.com, “Lars Eller, Splits”, <<http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=2>>.

arbitration eligible in Mr. Eller's Platform Year and came to settlements prior to this submission.<sup>14</sup>

### **A. MATS ZUCCARELLO**

On July 22, 2014, Mats Zuccarello signed a one-year contract with the New York Rangers worth \$3.5 million.<sup>15</sup> Mr. Zuccarello's contract represents a fair market value for a top-six forward in the NHL, and his performance represents what is expected at a \$3.5 million valuation. In contrast to Mr. Eller, Mr. Zuccarello was a consistent statistical producer during his Platform Year, scoring 19 goals and an impressive 40 assists for 59 points in 77 games.<sup>16</sup> Mr. Zuccarello outperformed Mr. Eller in every major offensive category and was integral to the Rangers offense, finishing third in goals and first in both points and assists.<sup>17</sup> Moreover, while Mr. Eller produced a point every 47:16 played, Mr. Zuccarello was more than twice as productive, producing a point every 22:22.<sup>18</sup>

Mr. Zuccarello also performed well on the powerplay, producing at nearly six times the rate as Mr. Eller (17 powerplay points vs. 3), notwithstanding that New York scored the exact same number of powerplay goals (48) as Montreal during the 2013-2014 season. Mr. Zuccarello was also a reliable two-way player – recording a +11, among the best on the Rangers and a drastic contradistinction to Mr. Eller's team-worst -15 – and

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<sup>14</sup> Capgeek, <[www.capgeek.com](http://www.capgeek.com)>.

<sup>15</sup> *Ibid.*

<sup>16</sup> NHL.com, "Mats Zuccarello, Stats", <<http://www.nhl.com/ice/player.htm?id=8475692&view=stats>>.

<sup>17</sup> NHL.com, "Mats Zuccarello, Splits", <<http://www.nhl.com/ice/playerstats.htm?gameType=2&position=F&season=20132014&sort=points&status=A&team=NYR&viewName=summary>>.

<sup>18</sup> <http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=2>;  
<http://www.nhl.com/ice/player.htm?id=8475692&view=splits>

played a vital role on New York's 3<sup>rd</sup> ranked penalty kill, averaging 33 seconds per game in penalty kill time.<sup>19</sup>

## **B. CHRIS KREIDER**

On July 23<sup>rd</sup>, 2014, Chris Kreider signed a two-year deal with the New York Rangers at an average annual salary of \$2.475 million.<sup>20</sup> Montreal concedes that Mr. Kreider has far less NHL experience than Mr. Eller, but submits that the latter's Platform Year makes him directly comparable for the purposes of this arbitration to Mr. Eller. Like Mr. Zuccarello, Mr. Kreider represents the offensive production expected from a top-six forward at the NHL level. Mr. Kreider played in 66 games during his Platform Year, recording 17 goals and 37 points.<sup>21</sup> He produced a point for each 28:03 played, far superior to Mr. Eller's 47:16. Mr. Kreider outperformed Mr. Eller in every major offensive category while remaining defensively responsible, recording a +14 rating.<sup>22</sup>

While Mr. Eller is rightfully lauded for his impressive performance in the 2014 Stanley Cup Playoffs, his performance nonetheless pales in comparison to Mr. Kreider's. In the 2014 playoffs, Mr. Eller produced, on a per game basis, 0.29 goals, 0.47 assists and 0.76 points, along with an impressive +6 rating and one shorthanded goal as Montreal advanced to the Eastern Conference Finals. However, Mr. Kreider produced, on a per game basis, 0.33 goals, 0.53 assists and 0.87 points, with three powerplay goals and one game-winning goal, helping the Rangers make a run for the Stanley Cup.<sup>23</sup>

The Montreal Canadiens recognize that Mr. Kreider has played only 88 career NHL games compared to Mr. Eller's 287, and submit that Mr. Eller's experience and

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<sup>19</sup> *Ibid*; <http://www.nhl.com/ice/teamstats.htm?season=20132014&gameType=2&viewName=penaltyKill>

<sup>20</sup> Capgeek, <[www.capgeek.com](http://www.capgeek.com)>.

<sup>21</sup> NHL.com, "Chris Kreider, Stats" <<http://www.nhl.com/ice/player.htm?id=8475184&view=stats>>.

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

<sup>23</sup> <http://www.nhl.com/ice/player.htm?id=8475184&view=stats>



contribution to the Canadiens' penalty kill – he averaged a robust 1:24 penalty kill minutes per game in his Platform Year – militate in favour of a higher award than \$2.475 million annually. Like Mr. Eller, Mr. Kreider “[s]till needs to round out his all-round game and utilize his big frame more to his advantage in order to maximize his scoring potential.”<sup>24</sup> As such, Mr. Eller is ideally situated between Mr. Kreider and Mr. Zuccarello, despite being significantly less productive than both.

### **III. CONCLUSION**

Mr. Eller's statistical performance during his Platform Year suggest a troubling regression with respect to his offensive and defensive abilities, which poses a serious concern for the Montreal Canadiens organization. Mr. Eller's career suggests that his Platform Year is typical, expected, and represents his statistical mean with respect to offensive production. His lack of leadership qualities and clutch performances further militate toward a lower award. While experience and potential warrant an award greater than the award given to Mr. Kreider, Mr. Eller must improve his on-ice performance before he may be considered a bona fide top-six NHL forward, as Mr. Zuccarello has done. The Montreal Canadiens submit that Mr. Eller is properly situated between these two individuals and should be awarded a one-year contract at a value of \$3.1 million.

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<sup>24</sup> <http://www.tsn.ca/nhl/player-bio/chris-kreider/bio>