

In the Matter of Salary Arbitration Between:

Lars Eller

-AND-

The Montreal Canadiens

Team 9

Submission of Lars Eller

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## Introduction and Overview

This brief contains an analysis of the performance and contributions of Lars Eller of the Montreal Canadiens (“the Canadiens”). Offensive and defensive contributions have come to define Mr. Eller’s well-rounded 200-foot game. His outstanding playoff performance will continue to benefit and further the goals of the organization. Counsel for Mr. Eller submits that Mr. Eller is entitled to an award above the midpoint figure and that \$4.5 million per season is an appropriate and fair sum given his market value as a young up-and-coming two-way centreman.

### **Well-rounded 200-foot game**

Lars Eller is the perfect mixture of skill and grit who, at the tender age of 25, has already developed into a reliable centreman that can contribute on both ends of the ice and continues to show signs of improvement in his offensive and defensive contribution.

### *Offensive contributions*

For a third-line centreman, Mr. Eller has an impressive set of offensive skills that he showcases on a nightly basis and in different capacities. For instance, Mr. Eller has a special ability to register points on both special teams units. Except for the shortened 2013-2013 season, Mr. Eller has registered both powerplay and short-handed goals and assists in his three seasons with the Canadiens<sup>1</sup>. He also has an impressive goal-scoring touch in close-game situations. Half

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<sup>1</sup><http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20122013&gameType=2>

of Mr. Eller's goals in the 2013-2014 regular season came in the third period<sup>2</sup>. Of his 12 goals in that same season, three were game winners and five were scored when the Canadiens were tied<sup>3</sup>.

Mr. Eller is a shootout specialist. In 2013-2014, he scored in three of four attempts<sup>4</sup> up from 2012-2013 where he scored in one of two attempts<sup>5</sup>. Shootout goals do not count towards goal totals but they certainly impact his team's win totals and their chances of qualifying for the off-season. Clearly, Mr. Eller has some aptitude for scoring in make-or-break situations and this valuable intangible is something that most third-line centerman do not possess.

### *Defensive contributions*

One cannot judge a player's defensive game by only examining his plus/minus to the exclusion of other pertinent analytical factors. While Mr. Eller's plus/minus in the 2013-2014 regular season was the lowest on the Canadiens<sup>6</sup>, he has been given significant short-handed responsibilities and has excelled in that role. Mr. Eller averaged 1:24 short-handed minutes<sup>7</sup> per game on the league's fourth-ranked penalty kill in the 2013-2014 regular season<sup>8</sup>. It is obvious that Mr. Eller, as a penalty killer, would be on the ice for a disproportionate number of goals against.

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

<sup>3</sup><http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=2>

<sup>4</sup><http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=2>

<sup>5</sup><http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20122013&gameType=2>

<sup>6</sup><http://www.nhl.com/ice/playerstats.htm?fetchKey=20142MTLSASALL&viewName=summary&sort=plusMinus&pg=2>

<sup>7</sup><http://www.nhl.com/ice/playerstats.htm?fetchKey=20142MTLSASALL&sort=shortHandedTimeOnIce&viewName=timeOnIce>

<sup>8</sup><http://www.nhl.com/ice/teamstats.htm?fetchKey=20142ALLSAAALL&sort=penaltyKillPercentage&viewName=summary>

Over the last couple seasons, Mr. Eller has shown consistency in his takeaway-to-giveaway ratio. In 2013-2014, Mr. Eller registered 25 giveaways and produced 30 takeaways<sup>9</sup>. The previous season, Mr. Eller registered 19 giveaways and created 23 takeaways<sup>10</sup>. In both those seasons, Mr. Eller recorded roughly 20-percent more takeaways than giveaways.

Mr. Eller selflessly sacrifices his body for his team. In both the 2012-2013 and 2013-2014 regular season, Mr. Eller led all Canadiens forwards with 33<sup>11</sup> and 58<sup>12</sup> blocked shots, respectively.

Mr. Eller is not afraid to use his size to separate opposing players from the puck. He led all Canadiens forwards in 2013-2014 with 130 hits<sup>13</sup>, improving from the previous season where he was second amongst forwards with 86 hits<sup>14</sup>. Seeing as players tend to throw bodychecks on even-strength, this statistic illustrates a side of Mr. Eller's defensive game that is present not only in short-handed situations where he is expected to block shots, win face-offs and clear the puck from his own zone.

### **Outstanding playoff performance**

Mr. Eller proved to be a driving force behind the Canadiens' advancement to the Eastern Conference Finals in 2013-2014. Mr. Eller was second in team point production behind P.K.

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<sup>9</sup><http://www.nhl.com/ice/playerstats.htm?season=20132014&gameType=2&team=MTL&position=S&country=&status=&viewName=rtssPlayerStats>.

<sup>10</sup><http://www.nhl.com/ice/playerstats.htm?season=20122013&gameType=2&team=MTL&position=S&country=&status=&viewName=rtssPlayerStats>.

<sup>11</sup><http://www.nhl.com/ice/playerstats.htm?fetchKey=20132MTLSASALL&sort=blockedShots&viewName=rtssPlayerStats>.

<sup>12</sup><http://www.nhl.com/ice/playerstats.htm?fetchKey=20142MTLSASALL&sort=blockedShots&viewName=rtssPlayerStats>

<sup>13</sup><http://www.nhl.com/ice/playerstats.htm?fetchKey=20142MTLSASALL&sort=hits&viewName=rtssPlayerStats>.

<sup>14</sup><http://www.nhl.com/ice/playerstats.htm?fetchKey=20132MTLSASALL&sort=hits&viewName=rtssPlayerStats>.

Subban despite logging considerably lower minutes per game (16:27 versus 27:26, respectively) and relatively few powerplay minutes in comparison to other Montreal forwards<sup>15</sup>. Mr. Eller tallied 13 points including a shorthanded goal and a game-winning goal in 17 games<sup>16</sup>. Mr. Eller had a 5-game point streak from April 16 to May 1<sup>17</sup>. On the first playoff game against the Tampa Bay Lightning, Mr. Eller assisted Brian Gionta's short-handed goal in the second period to tie the game and then scored in the third period to give his team a lead<sup>18</sup>. His game-winning goal forced game 7 against the Boston Bruins and was arguably the most important goal of the Canadiens' playoff run as it was scored in an elimination game against a hated divisional rival<sup>19</sup>.

In face-offs, Mr. Eller's averaged 43.20% during the 17 playoff games in 2013-2014<sup>20</sup>. He was above 50% in short-handed face-offs<sup>21</sup>, making Mr. Eller a staple on the Canadiens penalty-kill. Mr. Eller even led all Canadiens' forwards in plus/minus with plus-6<sup>22</sup>. The plus/minus statistics are even more impressive when you consider the fact that the Canadiens allowed 45 goals against while only scoring 51<sup>23</sup>. Mr. Eller's 21.7 shooting percentage led all Montreal forwards<sup>24</sup>. His accuracy was crucial in tight games and made him a threat in the offensive zone.

Read together, Mr. Eller's point totals, face-off statistics, shooting percentages and plus/minus illustrate both his offensive capabilities and defensive discipline in the post-season. The aforementioned metrics, if anything, show that Mr. Eller elevates his game to a higher level

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<sup>15</sup><http://canadiens.nhl.com/club/stats.htm?gameType=3&season=20132014>

<sup>16</sup><http://www.nhl.com/ice/player.htm?id=8474189>.

<sup>17</sup><http://www.nhl.com/ice/player.htm?id=8474189&view=notes>

<sup>18</sup><http://www.nhl.com/gamecenter/en/recap?id=2013030121>.

<sup>19</sup><http://www.nhl.com/ice/player.htm?id=8474189&view=log&season=20132014>.

<sup>20</sup><http://www.nhl.com/ice/player.htm?id=8474189&view=log&season=20132014>

<sup>21</sup><http://www.nhl.com/ice/playerstats.htm?gameType=3&position=S&season=20132014&sort=totalFaceOf fs&status=A&team=MTL&viewName=faceOffPercentageAll>.

<sup>22</sup><http://canadiens.nhl.com/club/stats.htm?gameType=3&season=20132014>

<sup>23</sup><http://canadiens.nhl.com/club/stats.htm?gameType=3&season=20132014>

<sup>24</sup><http://www.nhl.com/ice/playerstats.htm?gameType=3&position=S&season=20132014&sort=gamesPlay ed&status=A&team=MTL&viewName=rtssPlayerStats>

when it matters most- in the post-season. While other Canadiens forwards struggled to produce and his high-scoring teammate, Alex Galchenyuk, remained inactive due to injury, Mr. Eller used his size, sniper-like shooting accuracy and hockey sense to improve his team's chances of success and make a difference when it counted most.

### Valid Comparable players

#### **Patrik Berglund**

In June 2014, the St. Louis Blues re-signed Patrik Berglund to a three-year deal valued at an average of \$3.7 million per season<sup>25</sup>. Mr. Berglund and Mr. Eller share several similar characteristics and have similar statistical outputs in the platform season. Both are big-bodied centermen entering the prime years of their respective careers. Mr. Berglund finished last season with 14 goals and 32 points in 78 games.<sup>26</sup> Mr. Eller registered 12 goals and 26 points in 77 games in that same period.<sup>27</sup> In the last three seasons, each averaged 24 and 25 points, respectively<sup>28</sup>. Mr. Berglund and Mr. Eller averaged almost identical time on-ice statistics and logged very similar powerplay minutes with Mr. Berglund tallying 1:32 on average and Mr. Eller, 1:06.<sup>29</sup> Both players registered three points each on the powerplay and spent roughly an equal amount of time shorthanded on any given night.<sup>30</sup> Mr. Eller, however, scored two

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<sup>25</sup><http://www.capgeek.com/player/964>

<sup>26</sup> [www.nhl.com/ice/playerstats](http://www.nhl.com/ice/playerstats)

<sup>27</sup> Ibid.

<sup>28</sup> Ibid.

<sup>29</sup> Ibid.

<sup>30</sup> Ibid.

shorthanded goals and added a shorthanded assist, while Mr. Berglund did not produce a single shorthanded point.<sup>31</sup>

Mr. Berglund and Mr. Eller had divergent plus/minus ratings in the platform year at plus-10 and negative-15, respectively.<sup>32</sup> This statistic must not be considered in isolation. Of all the Blues' forwards, only Derek Roy had a negative rating.<sup>33</sup> Mr. Berglund had the seventh lowest plus/minus amongst St. Louis forwards.<sup>34</sup> As a team, the Blues ended the season with a plus-37 whereas Montreal finished with only a plus-3 rating.<sup>35</sup>

Mr. Eller was more of a physical presence on the ice than Mr. Berglund. Mr. Eller's 130 hits, for instance, trumps Mr. Berglund's 88.<sup>36</sup> This statistic when read in conjunction with his penalty killing points and stellar face-off percentages, reveals that Mr. Eller may indeed be more valuable as a two-way centreman than Mr. Berglund

Unlike Mr. Eller, Mr. Berglund is just not a playoff performer. In the first-round, Mr. Berglund was a minus-7 against Chicago and failed to register a single point<sup>37</sup>. Mr. Eller, on the other hand, was a dominant force in his team's run to the Eastern Conference Finals, scoring five goals, including a game-winner and a shorthanded goal while maintaining a plus-6 rating throughout<sup>38</sup>.

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<sup>31</sup> Ibid.

<sup>32</sup> Ibid.

<sup>33</sup>

<http://www.nhl.com/ice/playerstats.htm?season=20132014&gameType=2&team=STL&position=F&country=&stat us=&viewName=summary>

<sup>34</sup> Ibid.

<sup>35</sup> [www.nhl.com/ice/teamstats](http://www.nhl.com/ice/teamstats)

<sup>36</sup> [www.nhl.com/ice/playerstats](http://www.nhl.com/ice/playerstats)

<sup>37</sup> <http://www.nhl.com/ice/player.htm?id=8473534&docid=TeamPlayerBio:13984#&navid=nhl-search>

<sup>38</sup> <http://www.nhl.com/ice/player.htm?id=8474189&docid=TeamPlayerBio:41071#&navid=nhl-search>

It is obvious that Mr. Eller is at least of comparable value - if not of more value- to his team than Mr. Berglund is to the Blues. Mr. Eller's counsel submits that he is entitled to an award similar to or greater than Mr. Berglund's \$3.7 million salary.

### **Milan Michalek**

In July 2014, the Ottawa Senators avoided arbitration by signing Mr. Michalek to a three-year deal worth \$4 million per season<sup>39</sup>. Mr. Michalek has spent the past five seasons in Ottawa and registered 17 goals and 39 points in 82 games during the 2013-14 season.<sup>40</sup> Mr. Eller, to his credit, had a slightly lower point total of 26 points in 5 fewer games.<sup>41</sup>

Mr. Eller has spent roughly half as much time on an average night as Mr. Michalek did on the powerplay and, not surprisingly, recorded about half the number of powerplay points (3 and 8 respectively)<sup>42</sup> in the platform year. While both players log significant shorthanded minutes for their teams, Mr. Eller's three shorthanded points eclipse Mr. Michalek's complete paucity of powerplay points. Mr. Eller's plus/minus was far from respectable at negative-15 but Mr. Michalek's minus-25 was utterly disgraceful and cannot be overlooked.<sup>43</sup> These statistics reveal that Mr. Eller is at least a little more responsible defensively than Mr. Michalek.

Further adding to Mr. Eller's value is his added physical presence on the ice. Mr. Eller had 44 more hits than Mr. Michalek.<sup>44</sup> Mr. Eller has also blocked more shots than Mr. Michalek<sup>45</sup>. Furthermore, Mr. Michalek's gung-ho style of play can wear him down over the

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<sup>39</sup><http://capgeek.com/player/128>

<sup>40</sup> [www.nhl.com/ice/playerstats](http://www.nhl.com/ice/playerstats)

<sup>41</sup> Ibid.

<sup>42</sup> Ibid.

<sup>43</sup> Ibid.

<sup>44</sup> Ibid.

<sup>45</sup> Ibid.

course of the 82-game schedule, and it can, and has, led to several injuries throughout his career, including knee surgery among others. Given Mr. Michalek's age, it is more likely that he has reached the height of his development whereas Mr. Eller is just beginning to evolve into an extremely gifted two-way centreman.

For the aforementioned reasons, counsel for Mr. Eller submits that Mr. Eller is entitled to an award similar to or greater than Mr. Michalek's \$4 million salary.

### Conclusion

Mr. Eller is indisputably an asset to the Montreal Canadiens. He has a complete two-way game that illustrates both his offensive acumen and his defensive acumen. As his performances in the 2013-2014 playoffs indicate, he is poised to continue to develop and prosper in whatever role he is handed as a member of the Canadiens. The organization will not regret awarding Mr. Eller for his positive contributions to the team's success much like they do not regret trading for Mr. Eller in the first place. When comparing Mr. Eller to other comparable forwards who have received awards in the last season, it is obvious that Mr. Eller is entitled to an award above the midpoint figure of \$3.5 million and that \$4.5 million is an appropriate and fair award.