

IN THE MATTER OF SALARY ARBITRATION

BETWEEN:

LARS ELLER

(THE “PLAYER”)

- AND -

THE MONTREAL CANADIENS

(THE “CLUB”)

THE CLUB’S BRIEF



TEAM 4

Counsel for THE CLUB

TABLE OF CONTENTS

1	INTRODUCTION	2
1.1	Club Position	2
1.2	Lars Eller	2
2	COMPARABLE PLAYER SELECTION	3
3	PLATFORM YEAR PERFORMANCE	4
4	CAREER PERFORMANCE.....	5
4.1	Comparable Players' Career Statistics Prior To Contract	5
4.2	Trends In Points Per Game Prior To Contract.....	6
5	ADDITIONAL CONSIDERATIONS.....	7
5.1	Playoff Performance	7
6	CONCLUSION	8

1 INTRODUCTION

[1] This brief pertains to a matter of salary arbitration between Lars Eller (“Eller” or the “Player”) and the Montreal Canadiens (the “Canadiens” or the “Club”) pursuant to Article 12 of the Collective Bargaining Agreement (“CBA”) between the National Hockey League (“NHL”) and the National Hockey League Players’ Association (“NHLPA”) entered into on February 15, 2013.

[2] This brief will look at the contributions made by Eller in the NHL and his fair value as a starting forward in the league. The analysis will focus on his contribution to scoring and his role within the Canadiens’ organization.

1.1 CLUB POSITION

[3] The club believes that a fair market value for the contributions of the Player is approximately \$3.1 million. This amount was arrived at after analyzing the Average Annual Value (“AAV”) of players who have had careers and Platform Years similar to that of the Player.

1.2 LARS ELLER

[4] Lars Eller is a hard working depth player that is yet to find the scoring touch necessary to earn a spot as a top-6 forward with the Club. Eller was drafted by the St Louis Blues with the 13th pick in the first round of the 2007 NHL Entry Draft¹. Eller did not play his first game in the NHL until November 5, 2009. Eller was traded to the Canadiens on June 17, 2010 along with Ian Schultz as part of a trade for Jaroslav Halák². Eller is currently 25 years old³.

¹ <http://canadiens.nhl.com/club/player.htm?id=8474189>

² <http://www.sportsnet.ca/hockey/nhl/halak-blues/>

[5] Since being acquired by the Canadiens Eller has been a solid contributor to the organization but must improve his ability to score points to be considered an elite player in the league.

2 COMPARABLE PLAYER SELECTION

[6] The most relevant criteria when selecting comparable players are: age, NHL experience, platform year performance and career performance. These factors allow us to compare Eller with a much more narrow set of players that have demonstrated similar value to their organizations.

[7] In accordance with Article 12 of the CBA, several comparable players have been selected by the Club. These players are: Artem Anisimov (“Anisimov”), C, Columbus Blue Jackets, and Jiří Tlustý (“Tlustý”), RW, for the Carolina Hurricanes.

[8] Following the 2012-13 season, Artem Anisimov agreed to a three-year deal with the Columbus Blue Jackets with an AAV of \$3.283 million⁴. At the time, Anisimov had played four seasons in the NHL, 279 games and was 25 years old⁵. This is very comparable to the 286 games played by Eller and four years of NHL experience. Anisimov was drafted in the 2006 NHL Entry Draft.

³ <http://www.nhl.com/ice/player.htm?id=8474189>

⁴ <http://capgeek.com/player/645>

⁵ <http://www.nhl.com/ice/player.htm?id=8473573>

[9] The second comparable player to Eller is Jiří Tlustý of the Carolina Hurricanes. On July 1, 2014⁶ Tlustý signed a one-year deal with the Carolina Hurricanes with an AAV of \$2.95M⁷. At the time of the signing Tlustý had played in 344 NHL games and was 26 years old⁸. Jiří was selected 13th overall in the 2006 NHL Entry Draft. This is comparable to Eller's selection as the 13th overall pick of the 2007 NHL Entry Draft.

3 PLATFORM YEAR PERFORMANCE

[10] The 2013-14 season represented the Platform Year for the basis of the Player's salary arbitration. During the Platform Year, Eller was able to contribute 26 points while managing to stay healthy for the majority of the season. While the contribution of 12 goals and 14 assists placed Eller 9th on the Canadiens' roster in points⁹, he still ranks significantly below the comparable players in points-per-game during their Platform Years.

Table 1: Eller v. Comparable Players - Platform Year Statistics¹⁰

Player	Season	GP	G	A	PTS	PIM	PPG	PMG	+/-
Eller	2013-14	77	12	14	26	68	0.338	0.883	-15
Anisimov	2012-13*	35	11	7	18	18	0.514	0.343	-6
Tlustý	2013-14	68	16	14	30	30	0.441	0.324	+2

*Lockout shortened 48 game NHL season.

[11] From a points-per-game perspective Eller trailed the other comparable players significantly. However, he was able to out produce Anisimov on total points, but this was due to the shortened 2012-13 season. When compared to Anisimov over the course of his career, as will be seen in the following section, the points-per-game analysis holds true. Eller also significantly

⁶ <http://www.cbssports.com/nhl/players/playerpage/1137128/jiri-tlusty>

⁷ <http://www.capegeek.com/player/194>

⁸ <http://hurricanes.nhl.com/club/player.htm?id=8473482>

⁹ <http://canadiens.nhl.com/club/stats.htm>

¹⁰ ¹⁰ <http://www.nhl.com/ice/player.htm?id=8474189> (Eller); <http://www.nhl.com/ice/player.htm?id=8473573> (Anisimov); <http://www.nhl.com/ice/player.htm?id=8473482> (Tlustý).

trailed the comparable players in +/- rating and spent a considerable amount of time in the penalty box.

4 CAREER PERFORMANCE

[12] Throughout his career Eller has been inconsistent with his ability to score points. Since playing for the Club he has shown dramatic variation with his ability to produce. Table 2 provides the Player's key statistics over the course of his career.

Table 2: Career Statistics for Lars Eller¹¹

Season	Team	GP	G	A	PTS	PIM	PPG	PM/G
2009-10	STL	7	2	0	2	4	0.286	0.571
2010-11	MTL	77	7	10	17	48	0.221	0.623
2011-12	MTL	79	16	12	28	66	0.354	0.835
2012-13*	MTL	46	8	22	30	45	0.652	0.978
2013-14	MTL	77	12	14	26	68	0.338	0.883

*Lockout shortened 48 game NHL season.

[13] The Player was able to show dramatic improvement and average 0.652 points per game during the 2012-13 season, but given the short nature of the year these numbers are unreliable and would likely not remain consistent over an 82 game season.

4.1 COMPARABLE PLAYERS' CAREER STATISTICS PRIOR TO CONTRACT

[14] Table 3 reviews the entire career performance of the comparable players prior to contract signing.

Table 3: Eller v. Comparable Players - Career Statistics Prior to Contract¹²

Player	Season	GP	G	A	PTS	PIM
Eller	2013-14	286	45	58	103	231
Anisimov	2012-13	279	57	69	126	98
Tlusty	2013-14	344	73	69	142	100

¹¹ <http://www.nhl.com/ice/player.htm?id=8474189>

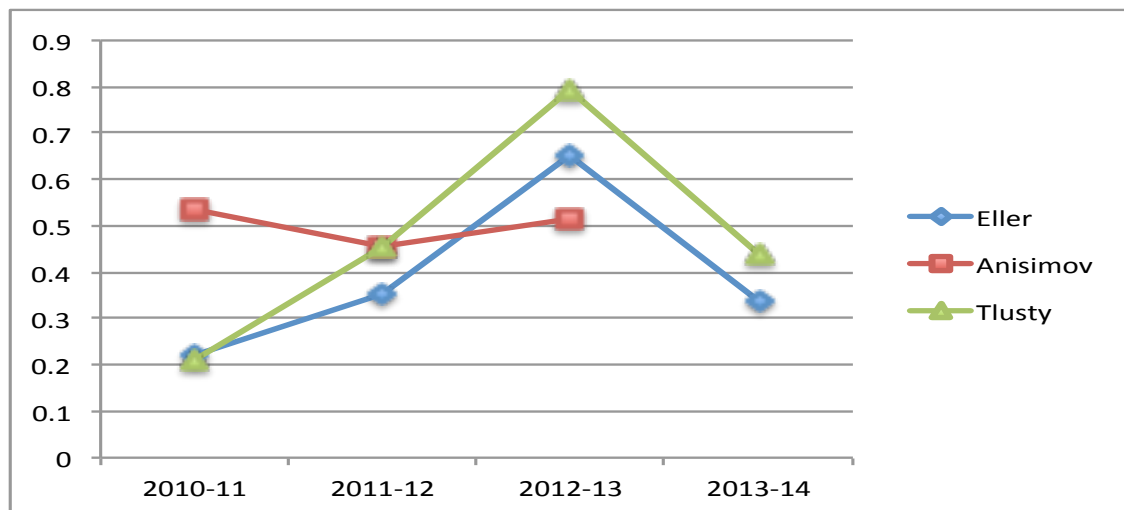
¹² <http://www.nhl.com/ice/player.htm?id=8474189> (Eller); <http://www.nhl.com/ice/player.htm?id=8473573> (Anisimov); <http://www.nhl.com/ice/player.htm?id=8473482> (Tlusty).

[15] Although Eller has played more games than Anisimov he has not produced at the same level in terms of goals or assists. He trails both comparable players in the major categories and leads the group in penalty minutes. This accumulation of penalty minutes not only gives opposing teams an increased opportunity to score, but also temporarily deprives the Club of having a high draft pick on the ice.

4.2 TRENDS IN POINTS PER GAME PRIOR TO CONTRACT

[16] Figure 1 shows the points-per-game progression for each of the comparable players in the years prior to signing their contract. Anisimov's most recent statistics have been excluded since his contract was signed after the 2012-13 season. As can be seen, Eller has typically produced less than Anisimov and has never produced more than Tlustý. Although the Player appeared to be showing progress after the 2012-2013 lockout shortened season, he seems to have regressed in his most recent season – the Platform Year.

Figure 1: Career Points-Per-Game Progression Prior to Contract



Given the importance of point scoring by forwards in the league the trend is troubling. During the 2013-2014 season the Canadiens finished 21st in the NHL with 2.55 goals-per-game, leaving them in the bottom 10 teams in terms of scoring. It is up to players like Eller to elevate their game and improve the overall scoring for the Club. The comparable players have already done this for their respective clubs, with Anisimov consistently producing high numbers for his clubs and Tlustý, despite a similar points trend as Eller, still outperforming Eller on a career and Platform Year basis.

5 ADDITIONAL CONSIDERATIONS

[17] Although the Player has not performed as well as comparable players the Club believes that due to additional considerations, namely his playoff performance, the Player has a fair market value similar to, or slightly greater, than that of Tlustý.

5.1 PLAYOFF PERFORMANCE

[18] Eller has outplayed his peers during the playoffs. The playoffs are a time of increased importance for a franchise given the ongoing desire to win a championship. However, it is important to note that the comparison is not relevant to Tlustý as his club has not yet reached the playoffs during his NHL career. Table 4 breaks down the playoff performance of the comparable players.

Table 4: Comparable Players - Career Playoff Statistics¹³

Player	Season	GP	G	A	PTS	PIM	P/G	PIM/G	+/-
Eller	2013-14	25	5	10	15	22	0.600	0.880	+7
Anisimov	2012-13	26	4	7	11	4	0.423	0.154	+3
Tlustý	2013-14	0	0	0	0	0	N/A	N/A	N/A

¹³ <http://www.nhl.com/ice/player.htm?id=8474189> (Eller); <http://www.nhl.com/ice/player.htm?id=8473573> (Anisimov); <http://www.nhl.com/ice/player.htm?id=8473482> (Tlustý).

[19] Eller's ability to elevate his game it matters most is a significant asset. While these numbers represent a dramatic increase from his regular season numbers he still only marginally outperforms Anisimov. The Club concedes the importance of a player that rises to expectations during the post season and has taken this into account in the \$3.1 million valuation of Eller. However, the Club also recognizes that in order to reach the playoffs team members must perform consistently during the regular season. In this regard Eller lags far behind the comparable players.

6 CONCLUSION

[20] In Conclusion, although Eller is a significant asset to the Club a fair value for his contributions is less than the \$3.5 million AAV requested. In terms of comparable players he trails both Artem Anisimov and Jiří Tlustý in the most essential production categories such as total points and points-per-game. The Player also spends a significant amount of time in the penalty box depriving him team of a quality player and providing the other team with an enhanced opportunity to score.

[21] The Club does not refute that Eller is a very talented young player. That being said, he has failed to live up to his potential as a first round draft pick. We hope that he will continue to progress and that the Platform Year is only a minor setback. If the Player is able to improve and contribute more points in the upcoming years it may be possible to revisit the issue given the short length of contracts awarded through arbitration.

[22] Based on the information contained within this brief the Club believes that an appropriate award for the Player would be slightly less than the salary with an AAV of \$3.28 million given to Artem Anisimov and closer to the one-year contract with an AAV of \$3.1 million given to Jiří Tlustý. We believe the fair market value for Lars Eller is \$3.1 million per year.