

2014 Hockey Arbitration Competition of Canada

Lars Eller v. The Montreal Canadiens

Team 10

Submission on Behalf of Lars Eller

INTRODUCTION

The following brief outlines the qualities and contributions of Lars Eller ("Mr. Eller" or the "Player"). A 25 year old, 6' 2", 215lbs left-handed center, Mr. Eller has been a member of the Montreal Canadiens (the "Club" or the "Canadiens") for 4 seasons and the overwhelming majority of his career.¹ Mr. Eller has accumulated the minimum 4 years of professional experience and is thus eligible for salary arbitration pursuant to the requirements of section 12.1 of the National Hockey League *Collective Bargaining Agreement* ("CBA").² It is the Player's respectful submission that a review of the relevant evidence demonstrates that Mr. Eller is undoubtedly deserving of a salary arbitration award above the \$3,500,000 midpoint salary. The Player submits that he is entitled to an award of \$3,800,000.

OVERALL PERFORMANCE

Season Performance³

Season	Team	GP	G (G/GP)	A (A/G)	P (P/G)	+/-	PI M	PP G	GW G	S	S%	HIT S	TOI/ G
2009-2010	Blues	7	2 (0.28)	0 (0)	2(0.28)	2	4	1	0	8	25.0	8	10:49
2010-2011	Canadiens	77	7 (0.09)	10 (0.12)	17 (0.22)	-4	48	0	2	79	8.97 9	85	11:08
2011-2012	Canadiens	79	16 (0.20)	12 (0.15)	28 (0.35)	-5	66	2	2	129	12.4	72	15:18
2012-2013	Canadiens	46	8 (0.17)	22 (0.47)	30 (0.65)	8	45	1	1	84	9.5	86	14:49
2013-2014	Canadiens	77	12 (0.15)	14 (0.18)	26 (0.33)	-15	68	2	3	137	8.8	130	15:57
Career Totals	N/A	286	45 (0.15)	58 (0.20)	103 (0.36)	-14	231	6	8	437	10.3	381	N/A

Mr. Eller's career statistics illustrate that he is a dynamic center who contributes both offensively and defensively. Mr. Eller had an impressive 2012-2013 campaign, contributing 8

¹ <http://www.nhl.com/ice/player.htm?id=8474189>

² NHL Collective Bargaining Agreement (CBA), 2013, s 12.1(A-C).

³ <http://www.nhl.com/ice/player.htm?id=8474189&docid=TeamPlayerBio:41071#&navid=nhl-search>

goals and 22 assists for a career-high 30 points in a mere 46 games.⁴ At 25 years of age, Mr.

Eller has the potential to only further develop his offensive abilities moving forward.

Defensively, he is regularly used as a shutdown center, matching up against other teams top lines on a consistent basis. Mr. Eller's size and speed allow him to play a physical and aggressive brand of hockey. During the shortened 2012-2013 season, he delivered 86 hits while also blocking 33 shots.⁵ Similarly, in the 2013-2014 season he delivered 130 hits while blocking 58 shots.⁶ Mr. Eller has also evidenced that he can contribute effectively through special teams play as he has often been used on the Club's power play and penalty kill. In addition, Mr. Eller is also strong in the faceoff circle. During the 2013-2014 regular season he won 53.2% of the faceoffs he took, placing him within the top 30 players in the league for this statistical category.⁷

Playoff Performance⁸

Season	Team	GP	G (G/GP)	A (A/G)	P (P/G)	+/-	PIM	PPG	S	S%	HITS	TOI/G
2010-2011	Canadiens	7	0	2	2	1	4	0	11	0	18	13:04
2012-2013	Canadiens	1* ⁹	0	0	0	0	0	0	0	0	2	8:43
2013-2014	Canadiens	17	5	8	13	6	18	0	23	21.7	30	16:27
Playoff Totals	N/A	25	5	10	15	7	22	0	34	14.7	50	N/A

Mr. Eller has also demonstrated that he is capable of producing during the playoffs.

During the 2013-2014 playoff campaign Mr. Eller was second on the team in scoring, contributing an impressive 13 points in 17 games, with an average TOI of 16:27.¹⁰ During that same playoff season, he was a +6 while displaying his penchant for physical play by delivering

⁴ *Ibid.*

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

⁶ <http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=2>

⁷ <http://www.nhl.com/ice/playerstats.htm?fetchKey=20142ALLSASALL&viewName=faceOffPercentage&sort=faceOffWinPctg&pg=1>

⁸ *Supra* note 1.

⁹ Mr. Eller featured in only 1 game in the 2012-2013 playoffs due to a concussion he suffered during game two of a first round series against the Ottawa Senators. See <<http://www.calgaryherald.com/sports/Johnson+Lars+Eller+emerging+star+Montreal+five+months+after+devastating/9013444/story.html>>.

¹⁰ <http://www.nhl.com/ice/player.htm?id=8474189&view=splits&season=20132014&gameType=3>

30 hits over the 17 games.¹¹ In short, Mr. Eller is a promising and multidimensional young talent, and a player whose performance does not falter during the high intensity of the NHL playoffs.

GAMES PLAYED & INJURY HISTORY

Mr. Eller is a durable and consistent contributor. Mr. Eller has featured in a total of 286 regular season NHL games and a total of 25 playoff games.¹² He has never suffered an injury or illness during his NHL career which has sidelined him for more than 5 games. In the 2011-2012 season, Mr. Eller featured in 79 regular season games.¹³ During the 2012-2013 season, he participated in 46 of a possible 48 regular season games.¹⁴ Most recently, Mr. Eller appeared in 77 games in the 2013-2014 regular season.¹⁵ Collectively, since the 2010-2011 regular season, Mr. Eller has participated in 279 of a possible 294 NHL games within which he was eligible to participate.¹⁶ In other words, Mr. Eller has featured in an impressive 94.8% of games since the 2010-2011 season.¹⁷ It is reasonable to assume that Mr. Eller will almost indefinitely feature in most, if not all, of the Club`s games moving forward.

LENGTH OF SERVICE

Mr. Eller was selected 13th overall in the first round of the 2007 NHL entry draft by the St. Louis Blues.¹⁸ In 2008 and at the age of 19, Mr. Eller signed a three year entry level contract with the St. Louis Blues.¹⁹ Mr. Eller was traded to the Canadiens, along with Ian Schultz, in exchange for goaltender Jaroslav Halak in the summer of 2010.²⁰ Mr. Eller has featured in 279

¹¹ *Ibid.*

¹² *Supra* note 1.

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ *Ibid.*

¹⁶ *Ibid.*

¹⁷ *Ibid.*

¹⁸ *Ibid.*

¹⁹ *Supra* note 3.

²⁰ <http://www.nhl.com/ice/player.htm?id=8474189&view=notes>

for the Canadiens over the past four regular seasons.²¹ Mr. Eller has spent the overwhelmingly majority of his career as a Canadien, during which he has served the club admirably.

CONTRIBUTIONS TO THE COMPETITIVE SUCCESS OF THE CLUB

The Canadiens have secured a playoff berth in three of the four seasons Mr. Eller has been a member of the Club.²² The Canadiens finished 4th in the Eastern Conference during the 2013-2014 season with a record of 46-28-8.²³ Mr. Eller was pivotal in the Club's success during the playoff campaign, raising his level of play to lead the Club to the Eastern Conference finals. He was 2nd on the club in scoring during the 2013-2014 playoffs, with 13 points in 17 games finishing ahead of teammates such as Thomas Vanek, Max Pacioretty and Tomas Plekanec.²⁴

SPECIAL QUALITIES OF LEADERSHIP & PUBLIC APPEAL

Mr. Eller is both a valuable leader and a player with marketable public appeal. Mr. Eller leads by example and has demonstrated that he is capable of producing explosive offense. On January 4th, 2012, he scored 4 goals in a game to lead the Canadiens to a 7-3 victory over the Winnipeg Jets.²⁵ During the commencement of the 2013-2014 season, Mr. Eller had an explosive offensive start contributing 5 points, including 3 goals, in the two opening games of the season.²⁶ Mr. Eller is also a popular figure among the Club's fans and the NHL generally. His offensive skill, in combination with his determined style of play has made him a fan favorite.

COMPARABLE PLAYERS, PERFORMANCE & COMPENSATION

In order for an arbitrator to properly assess an adequate award for a player in arbitration, comparable players must be examined in order to determine salary benchmarks. The following

²¹ *Supra* note 1.

²² *Ibid.*

²³ <http://www.nhl.com/ice/standings.htm?season=20132014&type=CON>

²⁴ <http://canadiens.nhl.com/club/stats.htm?gameType=3&season=20132014>

²⁵ <http://www.cbc.ca/sports/hockey/nhl/eller-nets-4-in-canadiens-win-over-jets-1.1285054>

²⁶ <http://www.calgaryherald.com/sports/Johnson+Lars+Eller+emerging+star+Montreal+five+months+after+devastating/9013444/story.html>

players used as comparables were arbitration eligible at the end of the 2013-2014 NHL season.

Patrik Berglund, Jamie McGinn, and Jiri Tlustý serve as ideal comparable players. For comparison purposes, salaries will be discussed in terms of Average Annual Value (AAV).

Table 1. Contractual Background of Comparable Players²⁷

Player	Age	Team	Signing Date	AAV of Contract (\$)
Lars Eller	25	Montreal Canadiens	TBD	TBD
Patrik Berglund	26	St. Louis Blues	June 27, 2014	3,700,000 (3 yr contract)
Jamie McGinn	26	Colorado Avalanche	June 19, 2014	2,950,000 (2 yr contract)
Jiri Tlustý	26	Carolina Hurricanes	July 1, 2014	2,950,000 (1 yr contract)

Table 2. Career Statistics (excluding Platform Year)²⁸

Player	GP	G (G/GP)	A (A/GP)	P(P/GP)	+/-	PIM (PIM/GP)	SOG	SOG %
Lars Eller	209	33(0.16)	44(0.21)	77(0.37)	+1	163(0.78)	300	11.0
Patrik Berglund	358	92(0.26)	96(0.27)	188(0.53)	+13	100(0.28)	709	13.0
Jamie McGinn	268	46(0.17)	38(0.14)	84(0.31)	-31	133(0.50)	453	10.2
Jiri Tlustý	276	57(0.21)	55(0.20)	112(0.41)	+5	78(0.28)	414	13.8

I. Patrik Berglund

Table 3. Platform Year Statistical Comparison²⁹

Player	GP	G (G/GP)	A (A/GP)	P(P/GP)	+/-	PIM (PIM/GP)	SOG	SOG %
Lars Eller	77	12(0.16)	14(0.18)	26(0.34)	-15	68(0.88)	137	8.8
Patrik Berglund	78	14(0.18)	18(0.23)	32(0.41)	+10	38(0.49)	144	9.7

Patrik Berglund and Mr. Eller had very similar offensive outputs in their respective platform season. Patrik Berglund and Mr. Eller played in almost the same number of games, had similar goals and assists with their P/GP varying by only 0.07P/GP, and their shot efficiency varied by a measly 0.9%. However, a distinguishing factor between the performance of these two players is that Patrik Berglund had a respectable +/- of +10, compared with Lars Eller's -15.

²⁷ <http://www.capgeek.com/>

²⁸ <http://www.nhl.com/ice/playerstats.htm>

²⁹ *Ibid.*

Also, Mr. Eller averages more penalty minutes than Patrik Berglund which is expected since Mr. Eller is a more physical offensive player, with 130 hits compared to only 88 hits by Patrik Berglund in their respective platform years.³⁰ Both players play a vital role on their teams as centers, and each player averaged similar ice-times during their platform year (16:10 for Patrik Berglund compared to 15:59 for Mr. Eller).³¹

The St. Louis Blues have committed to paying Patrik Berglund an AAV of \$3,700,000. Both players have had similar offensive outputs and each player has spent at least 4 years with their respective teams. Taking all factors into account including the fact that Lars Eller and Patrik Berglund have similar roles on their respective teams, are nearly the same age, and were both high draft picks, it would be consistent for the Canadiens to offer Mr. Eller a salary similar to that of Patrik Berglund. Therefore, it is submitted that an award of \$3,800,000 for Mr. Eller is justified.

II. Jamie McGinn

Table 4. Platform Year Statistical Comparison³²

Player	GP	G (G/GP)	A (A/GP)	P(P/GP)	+/-	PIM (PIM/GP)	SOG	SOG %
Lars Eller	77	12(0.16)	14(0.18)	26(0.34)	-15	68(0.88)	137	8.8
Jamie McGinn	79	19(0.24)	19(0.24)	38(0.48)	-3	30(0.38)	167	11.4

Jamie McGinn had a slightly better offensive output in his platform season than Mr. Eller. Jamie McGinn and Mr. Eller played in almost the same number of games but Jamie McGinn had slightly more goals and assists than Mr. Eller and his shot efficiency was greater by 2.6%. Both players had negative +/- in their respective platform seasons, however, up to last season Jamie McGinn was an abysmal -31 compared to Lars Eller's respectable +1 (see Table

³⁰<http://www.nhl.com/ice/playerstats.htm?gameType=2&position=S&season=20142015&sort=gamesPlayed&status=A&viewName=rtssPlayerStats>

³¹<http://www.nhl.com/ice/playerstats.htm?gameType=2&position=S&season=20132014&sort=timeOnIce&status=A&viewName=timeOnIce>

³² *Supra* note 28.

2). Both players averaged similar ice-times during their platform year; (15:47 for Jamie McGinn compared to 15:59 for Mr. Eller)³³ however, Mr. Eller has more responsibilities since he is a center (and must take face-offs) whereas Jamie McGinn is simply a left wing forward.

The Colorado Avalanche have committed to paying Jamie McGinn an AAV of \$2,950,000. Although, Jamie McGinn had more points this past season, Lars Eller has proven to be a better offensive player throughout his career by averaging more assists and points than Jamie McGinn (see Table X). Mr. Eller has also played four of the past five seasons with the Canadiens and has proven to be a key factor in his team's success, whereas Jamie McGinn has only played two full seasons with the Colorado Avalanche.³⁴ Due to the fact that Mr. Eller is a year younger, has proven to be a better overall player throughout his career, has increased responsibilities as a center, and has demonstrated more potential as a higher draft pick, it would be consistent for the Canadiens to offer Mr. Eller a salary that is superior to the one given to Jamie McGinn. Therefore, it is submitted that an award of \$3,800,000 for Mr. Eller is justified.

III. Jiri Tlustý

Table 5. Platform Year Statistical Comparison³⁵

Player	GP	G (G/GP)	A (A/GP)	P(P/GP)	+/-	PIM (PIM/GP)	SOG	SOG %
Lars Eller	77	12(0.16)	14(0.18)	26(0.34)	-15	68(0.88)	137	8.8
Jiri Tlustý	68	16(0.24)	14(0.21)	30(0.44)	+2	22(0.32)	131	12.2

Jiri Tlustý and Mr. Eller have had similar offensive outputs throughout their careers, and this trend continued into their respective platform season. Jiri Tlustý and Mr. Eller had similar goals and assists and their P/GP varied by only 0.10P/GP (0.44P/GP for Jiri Tlustý compared to 0.34P/GP for Mr. Eller). Over their careers both players have had similar +/-, with this past

³³ *Supra* note 31.

³⁴ <http://www.nhl.com/ice/player.htm?id=8473465&docid=TeamPlayerBio:43661#&navid=nhl-search>

³⁵ *Supra* note 28.

season Jiri Tlustý showcased a better +/- of +2 compared to what was an uncharacteristically low year for Mr. Eller with a -15. Mr. Eller averaged more penalty minutes than Jiri which is expected since Mr. Eller is a more physically-imposing offensive player, with 130 hits compared to only 88 hits by Jiri Tlustý in their respective platform years.³⁶ Both players averaged similar ice-times during their platform year, (15:10 for Jiri Tlustý compared to 15:59 for Mr. Eller)³⁷ however, Mr. Eller has more responsibilities since he is a center (and must take face-offs) whereas Jiri Tlustý is simply a left-wing forward.

The Carolina Hurricanes have committed to paying Jiri Tlustý an AAV of \$2,950,000. Jiri Tlustý and Mr. Eller are similar players, evidenced by similar offensive statistics. However, because Mr. Eller is a year younger and has increased responsibilities as a center, it would be consistent for the Canadiens to offer Mr. Eller a salary that is superior to the one given to Jiri Tlustý. Therefore, it is submitted that an award of \$3,800,000 for Mr. Eller is justified.

CONCLUSION

Mr. Eller has legitimized himself as a mainstay in the organization and a crowd favorite. Offensively, he has shown that he is capable of consistently producing. Defensively, he has been recognized for his ability to shut down the most skilled players on opposing teams. Mr. Eller is a valuable asset and a well rounded player that would be highly sought after by other organizations. The Player therefore submits that he be garnished an award of \$3,800,000.

³⁶ *Supra* note 30.

³⁷ *Supra* note 31