In the Matter of Salary Arbitration Between:

LARS ELLER

-AND-

THE MONTREAL CANADIENS

BRIEF FOR THE PLAYER

TEAM #22



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**I. INTRODUCTION AND OVERVIEW**

 Pursuant to section 12.9 of the NHL Collective Bargaining Agreement,[[1]](#footnote-1) this brief analyzes the performance and contributions of the Montreal Canadiens' Lars Eller. The evidence provided within will demonstrate that Mr. Eller is a gritty two-way forward with a complete game, a clutch contributor to the team's overall success, and has exhibited tremendous success in the faceoff circle. As such, Mr. Eller is entitled to an award above the $3.5 million midpoint, and will be a long-term value for the Canadiens' organization at $4.35 million.

**A. Multi-Faceted Player**

 Lars Eller is the quintessential gritty, two-way forward, capable of bringing success to his team at both ends of the ice. At 6'2" and 215 lbs, Eller can be viewed at one end of the ice as an imposing offensive presence with the potential to contribute greatly to the Club's offensive success.[[2]](#footnote-2) During the 2012-13 season, Eller scored 8 goals, 22 assists, and 30 points.[[3]](#footnote-3) Projected over a full season,[[4]](#footnote-4) these figures increase to 14, 39, and 53, respectively. [[5]](#footnote-5) In Eller's platform year, 2013-14, those numbers dipped to 12, 14, and 26, respectively. There are several reasons to believe that Eller's statistical totals from the platform year were an aberration that merits reducing the weight applied to them in determining the award value in the case at hand. For one, Eller's shooting percentage dropped significantly, to 8.8%, or 80% of his career average.[[6]](#footnote-6) Despite this significant drop in shooting percentage, Mr. Eller scored only .018 goals per game fewer than the previous season.[[7]](#footnote-7) Stretched out over an entire season, this is only 1.5 goals. Had Eller's puck luck been nearer to his career average of 11%, Eller would have achieved a career high in goals.[[8]](#footnote-8) His decrease in assists can be attributed to the lack of finishing ability of his linemates this season as well. Shooting percentage when Eller was on the ice dropped from 10.7% in the 2012-13 season to 5.97% during his platform year.[[9]](#footnote-9) This is an extremely low number, and indicative of extremely poor luck. His success in the 2013-14 playoffs, where his assist rate jumped back up to .47 per game, can be highly attributed to his linemates' shooting percentage returning to the average at 10.85%.[[10]](#footnote-10) Eller's .47 assists per game in the '13-14 playoffs was the same rate that he achieved in his highly productive 2012-13 season, which is reason to suggest that this is more indicative of the type of performance the Canadiens can expect from Eller in the future.[[11]](#footnote-11) Mr. Eller's decrease in offensive performance can also be explained by his decrease in offensive zone starts in his platform year, which dropped from 48.7% to 43.7%.[[12]](#footnote-12) Even more telling is that, despite this decrease, Mr. Eller's finishes in the offensive zone increased from 45.8% to 46.7%.[[13]](#footnote-13) This highlights the fact that Mr. Eller's overall offensive and transitional game has improved, and that the production he exhibited in the 2012-13 season, and the 2013-14 playoffs are more indicative of future predicted value.

 Eller's presence is also strongly felt on the defensive side of the puck, starting with his growing place as one of coach Michel Therrien's most trusted players on the Canadiens' penalty killing unit. Montreal's penalty killing unit was fourth in the NHL during Eller's platform year, killing penalties at a rate of 85.1%.[[14]](#footnote-14) Eller played the 6th most minutes of all Canadien forwards on the penalty kill.[[15]](#footnote-15) A big part of Eller's success on defense has been his ability to block shots. Last season, Eller totaled 58 blocked shots,[[16]](#footnote-16) which was good enough to place him first amongst Montreal's forwards[[17]](#footnote-17), and 26th among all NHL forwards.[[18]](#footnote-18)

 Eller makes his presence felt in even-strength situations as well, namely in his ability to generate turnovers. Eller has had a positive takeaway to giveaway ratio in each of the last three seasons, including a career high this past season with a rate of 1.2.[[19]](#footnote-19) Eller's physical, self-sacrificing style of play is also evidenced by the 130 hits he delivered in his platform season, which was first among Canadien forwards[[20]](#footnote-20), and 24th in the NHL for centers.[[21]](#footnote-21) Despite an increase in hits, Eller's discipline also led to a decrease in the number of penalties drawn per game.[[22]](#footnote-22) Any injury concerns resulting from this aspect of his game should be dismissed by the fact that Eller has missed only 15 games in his career with the Canadiens.[[23]](#footnote-23)

 Due to Mr. Eller's ability to provide above average value for the Montreal Canadiens in a host of offensive and defensive categories, Mr. Eller submits he is entitled to an award at least one dollar above the $3.5 million mid-point figure, and that $4.35 million would be a just award.

**B.** **Clutch Performer**

 Lars Eller has been a key contributor to the Montreal Canadiens organization when the most on the line, specifically in the playoffs. He has helped guide the Canadiens to the playoffs each of the last three seasons, where he has been one of the team’s most consistent and productive players. In 25 career playoff games, Mr. Eller has posted 5 goals and 10 assists, including one game winning goal, and a plus 7 rating.[[24]](#footnote-24) His most impressive run came during the 2013-2014 playoffs, in Mr. Eller’s platform year, when the team advanced to the Eastern Conference finals and he scored 13 points, ranking him 1st among forwards and 2nd on the team.[[25]](#footnote-25) He scored 2 goals and added 4 assists during his 5-game point streak to open the playoffs.[[26]](#footnote-26) Mr. Eller’s hot start set the tone for Montreal’s deep playoff run, but few were surprised because this is the type of clutch performance he has produced in the postseason throughout his career. What is even more remarkable about Eller's .76 points per game, is that he accomplished this despite starting only 37.9% of his shifts in the offensive zone, and averaging only 28 seconds of power play time per game.[[27]](#footnote-27)

 An unrated facet on Mr. Eller’s game is his proficiency on shootout attempts. Throughout his career, he has converted on an impressive 5 out 11 shootout attempts, and 1 out of 2 penalty shots.[[28]](#footnote-28) His success rate improved further in his platform year, where he converted on 3 out of 4 attempts for an extremely impressive 75% conversion rate.[[29]](#footnote-29) Montreal became reliant on Mr. Eller to close out games with goals in the shootout, and he was one of the four most used players by the club.[[30]](#footnote-30)

 It is very clear that Mr. Eller rises to the occasion when the stakes are high. Because of these invaluable qualities, Mr. Eller should be paid above the $3.5 million mid-point figure, and $4.35 million per year would be an appropriate figure.

**C. Faceoff Specialist**

 Lars Eller adds tremendous value in the faceoff circle as well, and is one of the top 20 faceoff men in the NHL. Overall, Eller wins 53.2% of all faceoffs he takes, which places him first on his team, and 26th in the NHL.[[31]](#footnote-31) His dominance in this area extends to special teams as well. Though he takes only the third-most faceoffs on the power play for the Canadiens,[[32]](#footnote-32) his win rate improves to 56.98%, which places him 38th best in the NHL.[[33]](#footnote-33) His success in this area is felt to an even greater extent on the penalty kill, where he takes the second most draws on the team. His 50% win rate in these situations ranks him 24th in the league.[[34]](#footnote-34) With this dual success on special teams, Eller is one of only 13 players in the NHL that ranks in the top 40 in both categories, further highlighting his value to the Canadiens in this aspect of his game.[[35]](#footnote-35)

 Where the drop between his power play win rate and penalty kill win rate may be seen as a sign of a larger problem, this number is actually in Eller's favor. Almost every player in the NHL sees a drop-off in their success rate on faceoffs between the two special teams units, and Eller's 6.98% is the 21st smallest gap.[[36]](#footnote-36) Any concern that the platform year for Eller is an outlier in faceoff categories is swiftly dismissed given that Eller's faceoff win percentage has increased each of the last three years as he has continued his developmente against NHL-level talent.[[37]](#footnote-37)

**II. VALID COMPARABLE PLAYERS**

**A. Adam Henrique – New Jersey Devils**

 In August 2013, Adam Henrique signed a six-year deal worth $4 million per year.[[38]](#footnote-38) Both of these players perform substantially similar roles, namely as third line centers for their respective teams, capable of producing at the rate of a top-six forward. Both players have experienced success in the playoffs, score at similar rates, and are heavily utilized on faceoffs.

 Over his career, Mr. Henrique has certainly averaged higher goals and points per game rates than Mr. Eller, but Mr. Henrique has also benefitted from centering a line with Zach Parise and Ilya Kovalchuk on the wings for one season, and enjoyed Kovalchuk’s offense prowess for one additional season. Mr. Eller has never had the opportunity to play on the same line with players of this caliber, and this must be taken into consideration when weighing Mr. Henrique's scoring against Mr. Eller's. In Mr. Henrique's platform season, his first without playing next to Parise, Henrique's points per game dropped from .57 to .38.[[39]](#footnote-39) While his goals per game increased slightly, this occurred largely because Henrique scored at a rate well above his career average. This means that while Henrique's goals per game of 0.26 was higher than the 0.16 Eller scored in his platform year, their combined differences in luck suggest that this gap should not be as large.[[40]](#footnote-40) Further, Henrique's drop in points per game to 0.38 brought him very close to Eller's poorer 2013-14 performance of 0.33, and makes Mr. Eller's more accurate performance in 2012-13 of 0.65 points per game much more valuable by comparison.[[41]](#footnote-41) Henrique also plays more on the power play than Mr. Eller (2:39 to 1:06), which should be noted when considering offensive production. A further point in Mr. Eller's favor in the offensive realm is that Mr. Eller improve his zone position on 3% of all shifts, while Mr. Henrique loses ground on average.[[42]](#footnote-42)

 Eller has a more valuable overall game than Mr. Henrique. Eller plays a more imposing, physical game, delivering significantly more hits per game than Henrique, and blocking shots at a rate of .75 per game to Henrique's .43.[[43]](#footnote-43) Eller also contributes more value in the faceoff circle. Eller's success rate on faceoffs is better at even strength (53.2% to 50.8%), on the power play (57.0% to 45.5%), and on the penalty kill (50% to 39.4%).[[44]](#footnote-44) Henrique's below average rate on special teams makes him a liability in those areas, whereas Eller, as discussed above, is one of only 13 players to feature in the top 40 in both categories.

 Due to the similarities between Mr. Eller and Mr. Henrique in offensive stats, and the contrast in comparing Mr. Eller's more complete skill set, Mr. Eller submits that he is entitled to an award greater than Mr. Henrique's $4 million salary, specifically, $4.35 million.

**B. Tyler Ennis – Buffalo Sabres**

 In July 2014, Tyler Ennis signed a 5-year contract extension worth $4.6 million per season.[[45]](#footnote-45) Mr. Eller and Mr. Ennis are similar in that both players have played in the NHL for 5 years, and both played sparingly during their first years in the league.[[46]](#footnote-46) Throughout their careers, Mr. Eller has been a much more complete forward, and their platform year’s are a great example of this point.

 Last year Mr. Eller had 26 points, while Mr. Ennis scored 43.[[47]](#footnote-47) Mr. Ennis produced those points by playing almost three minutes more of total ice time per game, including over two minutes more on the power play, and 1:23 less on the penalty kill.[[48]](#footnote-48) On the last place Buffalo Sabres, Mr. Ennis finds himself in many more scoring positions as he receives first line minutes and significant time on the power play. If he played for Montreal, Mr. Ennis would likely not receive nearly the amount of time on ice that he does in Buffalo. On the third line of a playoff caliber team, Mr. Eller produces respectable points, kills penalties, and chips in on the power play.

 Mr. Eller and Mr. Ennis are in different leagues when it comes to faceoff percentage. Last year, Mr. Eller had a faceoff percentage of 53.2%, tops on the Canadians for players who took over 10 faceoffs.[[49]](#footnote-49) On the other hand, Mr. Ennis had a miserable season in the faceoff circle, winning just 38.7% of his faceoffs.[[50]](#footnote-50) Mr. Eller’s ability to routinely win faceoffs in the offensive zone on the power play and in the defensive zone on the penalty kill is a critical aspect for both special teams units.

 Mr. Eller also has a big advantage in height and weight, and uses it to his advantage on the defensive side of the puck. Mr. Eller measures in a 6’2” and 215 pounds, whereas Mr. Ennis is just 5’9” and 169 pounds.[[51]](#footnote-51) Mr. Eller isn’t shy about throwing his weight around either, as he let all Canadian forwards with 130 hits last season, and also contributed 58 blocked shots.[[52]](#footnote-52) Mr. Ennis ended his season with just 89 hits and 53 blocked shots.[[53]](#footnote-53) Mr. Ennis also finished the season at minus 25, ten points worse than Mr. Eller.[[54]](#footnote-54)

 Mr. Ennis scored more points last season, but overall Mr. Eller had a more impressive season. He contributed to every phase of the game, and was an integral piece of the Canadiens playoff roster. As such, Mr. Eller should be paid in line with Mr. Ennis’ $4.6 million contract, which makes $4.35 million a fair and appropriate award.

**III. CONCLUSION**

Mr. Eller is a two-way forward who kills penalties, wins faceoffs at an extremely high rate, and scores goals at the most important times. Accordingly, Mr. Eller is entitled to an award above the $3.5 million midpoint, and he submits $4.35 million is a fair and appropriate award.

1. NHL Collective Bargaining Agreement, 2005, s.12. [↑](#footnote-ref-1)
2. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-2)
3. *Ibid.* [↑](#footnote-ref-3)
4. *Eller was limited to 47 games played because of the lockout.* [↑](#footnote-ref-4)
5. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-5)
6. *Ibid.* [↑](#footnote-ref-6)
7. *Ibid.* [↑](#footnote-ref-7)
8. *Ibid.* [↑](#footnote-ref-8)
9. http://www.behindthenet.ca/nhl\_statistics.php [↑](#footnote-ref-9)
10. *Ibid.* [↑](#footnote-ref-10)
11. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-11)
12. http://www.behindthenet.ca/nhl\_statistics.php [↑](#footnote-ref-12)
13. *Ibid.* [↑](#footnote-ref-13)
14. http://www.nhl.com/ice/teamstats [↑](#footnote-ref-14)
15. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-15)
16. *Ibid.* [↑](#footnote-ref-16)
17. http://mapleleafs.nhl.com/club/teamstatscomparison.htm [↑](#footnote-ref-17)
18. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-18)
19. *Ibid.* [↑](#footnote-ref-19)
20. http://www.nhl.com/ice/teamstats [↑](#footnote-ref-20)
21. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-21)
22. http://www.nhl.com/ice/player.htm?id=8474189&view=log&season=20132014 [↑](#footnote-ref-22)
23. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-23)
24. *Ibid.* [↑](#footnote-ref-24)
25. *Ibid.* [↑](#footnote-ref-25)
26. http://www.nhl.com/ice/player.htm?id=8474189&view=log&season=20132014 [↑](#footnote-ref-26)
27. http://www.behindthenet.ca/nhl\_statistics.php [↑](#footnote-ref-27)
28. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-28)
29. *Ibid.* [↑](#footnote-ref-29)
30. *Ibid.* [↑](#footnote-ref-30)
31. *Ibid.* [↑](#footnote-ref-31)
32. http://mapleleafs.nhl.com/club/teamstatscomparison.htm [↑](#footnote-ref-32)
33. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-33)
34. *Ibid.* [↑](#footnote-ref-34)
35. *Ibid.* [↑](#footnote-ref-35)
36. *Ibid.* [↑](#footnote-ref-36)
37. *Ibid.* [↑](#footnote-ref-37)
38. http://www.capgeek.com/ [↑](#footnote-ref-38)
39. http://www.nhl.com/ice/teamstats [↑](#footnote-ref-39)
40. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-40)
41. *Ibid.* [↑](#footnote-ref-41)
42. http://www.behindthenet.ca/nhl\_statistics.php [↑](#footnote-ref-42)
43. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-43)
44. http://www.behindthenet.ca/nhl\_statistics.php [↑](#footnote-ref-44)
45. http://www.capgeek.com/ [↑](#footnote-ref-45)
46. http://www.nhl.com/ice/playerstats [↑](#footnote-ref-46)
47. *Ibid.* [↑](#footnote-ref-47)
48. *Ibid.* [↑](#footnote-ref-48)
49. *Ibid.* [↑](#footnote-ref-49)
50. *Ibid.* [↑](#footnote-ref-50)
51. *Ibid.* [↑](#footnote-ref-51)
52. *Ibid.* [↑](#footnote-ref-52)
53. *Ibid.* [↑](#footnote-ref-53)
54. *Ibid.* [↑](#footnote-ref-54)