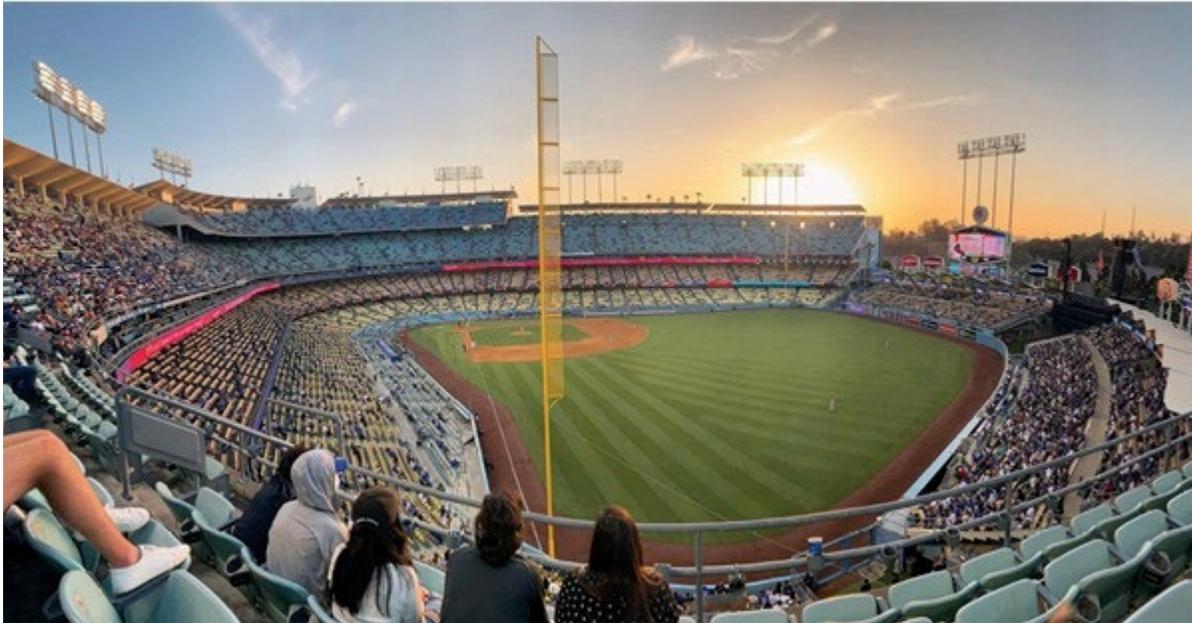


## Field of Liens: Real-Property Development in Baseball

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*Dodger Stadium has been home to the Los Angeles Dodgers since 1962 (Courtesy of the Los Angeles Dodgers)*

Baseball is at one and the same time an idyllic game for children and a gravely serious business for adults. A sport that can be played on a pastoral commons requires, in the world of commerce, space to which some can be admitted and from which others can be excluded—in short, what lawyers call real property. Land must be acquired, grandstands and other improvements must be constructed, and parking and transportation access must be arranged. In these respects, ballparks are like other forms of American urban development.

Yet stadiums are a breed apart from shopping malls, office buildings or municipal centers. They represent the significance of a city, literally as a “major league town,” above and beyond their bare economic data. They are founts of media content that create value well past their earnings from in-person attendance. And their reason for being is baseball, darn it; even crusty, hard-edged men and women in public life can get misty-eyed and perhaps not entirely rational just thinking about the subject.<sup>1</sup> It remains to be seen whether that peculiar bond between civic leaders and the sport, established by parents and kids entwined over the years in a single pastime, will survive as baseball competes for affection with football, basketball, soccer, skateboarding, and video games.

A number of elements of real-estate law and development can be illustrated by the country's ballparks. To that end, this article examines the two celebrated homes of the Dodgers, Ebbets Field in Brooklyn and Dodger Stadium in Los Angeles. The journey between these venues is one of the most surveyed subjects in all of baseball literature. The story features metaphors of one city's decline and another's ascent, a Homeric struggle between two stubborn men, and a seemingly undying memory of monumental betrayal.<sup>2</sup> Transcending all this baggage, even the stadiums themselves offer lessons for lawyers and developers alike.

### **Act I. A Ballpark Grows in Brooklyn**

**Assemblage.** For urban infill projects, it is critical to employ a strategy of discreet land acquisition. Charles Ebbets, an architect by profession, became president of the team then known as the Brooklynns<sup>3</sup> in 1898, the year that the proudly independent city of Brooklyn merged into New York City.<sup>4</sup> Desiring to escape the all-wood Washington Park, he had nominees set up a shell corporation that anonymously purchased a number of lots along Bedford Avenue in the "Pigtown" district. Though he attempted to maintain secrecy, word leaked out and some of the forty lotholders were able to hike their sales prices.<sup>5</sup> The land assemblage took roughly four years to complete. Ebbets built a \$750,000, 35,000-seat stadium bearing his name, which opened amid much local fanfare in 1913.<sup>6</sup>

**Design.** Commercial and civic projects often emphasize impressive, even awe-inspiring entryways and architecturally striking public areas, and ballparks are true to form. The design of Ebbets Field by the architect Charles Von Buskirk may not be suited to everyone's aesthetic taste, but a description of the opening defies reports of later decay:

Fans who arrived at the main entrance discovered an ornate rotunda with a soaring domed ceiling, gilded ticket booths, and a white Italian marble floor inlaid with red tiles in the pattern of the stitches on a baseball. Overhead, light came from a chandelier designed to look as if it were made of bats and balls. Valet parking service was offered to the swells who came by car, while businessmen were welcomed to use public phones equipped with desks and chairs.<sup>7</sup>

**Maintenance.** Even a cathedral requires upkeep; absent ongoing investment, a property can lose its reputation and value. The heirs of Ebbets and his partner Edward McKeever quarreled over the team's direction, while their loans from the Brooklyn Trust Company grew ever more precarious—the ballpark encumbered by its mortgages constituted an early example of a "field of liens." To reduce the likelihood of having to foreclose on those liens, the bank recommended that a lawyer named Walter Francis O'Malley join club management; along with Branch Rickey and others, he ultimately acquired equity interests in the team.<sup>8</sup> As a new executive, O'Malley learned that years of neglect had left the stadium both in poor repair and expensive to maintain. Reportedly, only "influence" with an

assistant's sister's father-in-law in the New York Fire Department was saving the venue from hazard citations.<sup>9</sup>

**Expansion.** A developer often has expansions in mind even as the original improvements are being built. Ebbets Field had nowhere to grow, either out or up. While the Yankees could host 67,000 fans and the Giants 54,000, the Dodgers had no means of achieving similar gates for their most popular home games.<sup>10</sup>

**Parking and Transportation.** Some of the most contentious issues for urban projects revolve around parking and traffic impacts.<sup>11</sup> Unfortunately, the vacant lots around Ebbets Field accommodated only 700 automobiles. Such contraptions were novelties when the park was built. But as World War II ended and city-dwellers flocked to outer Long Island and New Jersey, the lack of vehicle access threatened to cut ties with the longtime Dodger fan base.<sup>12</sup> Attendance languished; for the potential title-clinching Game 6 of the 1952 World Series, there were five thousand empty Ebbets seats.<sup>13</sup> As O'Malley wrote, "Ebbets Field was built in the Trolley car era. There are no trolleys to speak of today but there are automobiles and intelligently planned parkways."<sup>14</sup>



*Located in the Crown Heights section of Brooklyn, Ebbets Field was the home of the Dodgers from 1913 through the 1957 season, after which the team relocated to Los Angeles. (Photo: SABR-Rucker Archive)*

## Act II. Clash of the Gotham Titans

From this point onward, the story of the Dodgers' homes becomes more idiosyncratic. The experience of the club may be in a league of its own, but it nonetheless has applications for other types of real-property development.

By the 1950s, the specter of “community antenna” television haunted the entertainment industry. Still in its infancy, cable TV promised new revenues for baseball game broadcasts and uncertain positive and negative impacts on attendance. Installation of lighting for night games added to most teams' capital and operational expenses. The Dodgers fared better than other clubs with these changes in the short term. But a good investor like O'Malley was more concerned about the future, and he set his sights on a new location. [15](#)

Contrary to urban legend, O'Malley appears to have made good-faith efforts to relocate within Brooklyn—albeit always with a businessman's eye for profit. [16](#) Given the vital importance of transportation access, the Dodgers focused on sites adjacent to the Long Island Rail Road and connecting transit lines. Futuristic designs were produced, including a retractable-roof facility planned by Norman Bel Geddes and a translucent geodesic dome conceived by R. Buckminster Fuller. [17](#)

Astride the path of O'Malley's proposals loomed Robert Moses, the “power broker” of all New York development in the era. [18](#) Again contrary to urban legend, Moses was no enemy of baseball itself, but he did firmly believe that a stadium should sit on the outskirts of the city, served by highways rather than by surface streets or public transit. Indeed, his early vision for a ballpark near the 1939 World's Fair site, in the Flushing Meadows district of Queens, was finally realized with Shea Stadium. [19](#) The two men maneuvered themselves into an intractable duel, thrusting and parrying for several years over many sites and mutual accusations.

A bilateral conflict during project development sometimes requires the intervention of a third party. The lawyer in O'Malley seized on the possibility of an external solution to the impasse. Title I of the Federal Housing Act of 1949 (the “FHA”) offered federal funds for acquiring lands for “development or redevelopment for predominantly residential uses.” [20](#) The law would soon be used for private developments contributing in some manner to what became known as “urban renewal,” and O'Malley suggested to Moses that the Dodgers were worthy recipients of such a program's benefits, courtesy of Uncle Sam. The cities of Baltimore and Milwaukee took advantage of the FHA for similar purposes. And in 1954 the U.S. Supreme Court held, in *Berman v. Parker*, that a District of Columbia law constitutionally allowed non-blighted private property in a blighted area to be taken for private development with a public purpose; the case is best known today as a prologue to the controversial *Kelo v. City of New London* decision. [21](#)

Moses expressed horror at the prospect of helping O'Malley in such a fashion. In correspondence, he stated flatly that a ballpark could not be included in a "slum-clearance project." In fact, Moses had his sights set on other forms of equally private improvements that would be funded by his FHA grants. (Among them was a project awarded to Fred Trump, a prominent developer who kept a lower profile than does his son Donald.) Mayor Robert Wagner's legal staff came forward with arguments for using public authority to build a stadium, but it was too little and too late. By 1957, Moses had made clear that he would not grant approval to support relocation in any part of Brooklyn that the Dodgers considered acceptable.<sup>22</sup>

The ultimate weapon of any real-estate investor is the threatened alternative—the credible statement of a proponent, lessee, or purchaser that it will go elsewhere if terms cannot be reached with the municipality, lessor, or vendor. The Dodgers played seven games in Jersey City in 1956 and eight in 1957, and sold Ebbets Field, reserving a three-year leaseback. With the fading of efforts by the St. Louis Browns, Washington Senators, and Kansas City Athletics to move to Los Angeles, O'Malley opened up communications with representatives of the California city. He ostentatiously hosted Angelenos, with New York reporters present, at spring training in Vero Beach, Florida, in 1957. He also encouraged Horace Stoneham, the owner of the New York Giants, to explore prospects in San Francisco rather than in Minneapolis. O'Malley rightly reasoned that the other team owners, concerned with travel expenses, would not approve a single West Coast move—but might approve two in tandem.

The Giants proclaimed their relocation to San Francisco in August 1957 and the Dodgers quietly announced their move to Los Angeles in October, whereupon O'Malley entered eternal ignominy in Brooklyn.<sup>23</sup> The last game at Ebbets Field was witnessed by 6,702 souls. A wrecking ball swung into the old ballpark in February 1960. On the site now stands the Ebbets Field Apartments, a high-rise housing development whose grounds feature a sign reading "NO BALL PLAYING."<sup>24</sup>

### **Act III. A Ballad for Chavez Ravine**

The quest for Major League Baseball in Los Angeles pulled the Dodgers into the tortuous story of the Chávez Ravine district—the last vacant downtown sector, lying between the Hollywood and Pasadena freeways. For decades, the neighborhood had filled with shacks and houses principally of Mexican-American families.<sup>25</sup> The city housing authority used an FHA grant to acquire properties for the express purpose of constructing 3,360 replacement residences, part of the "Elysian Park Heights" development designed by Richard Neutra. Those who sold out were often promised first priority on the planned units. But a 1952 referendum rejected a housing project in the Ravine, and the city acquired the properties in 1953 for a fraction of the acquisition cost, on condition that the land be used for "public purposes only."<sup>26</sup> Eminent domain was used to claim the final properties. In 1959, the last

resident was televised being physically carried out of her home, which was quickly bulldozed.[27](#)

Mayor Norris Poulson, county supervisor Kenneth Hahn, and city councilwoman Rosalind Wyman persistently courted O'Malley. However, the savvy negotiator once disembarked from his airplane at LAX wearing a lapel pin reading "Keep the Dodgers in Brooklyn," and professed a desire for a ballpark not in the Ravine but on the west side of town, the home of the entertainment industry and the wealthier enclaves. Similar strategies have been wielded by many tenants—their current property is a gem when speaking with other owners, and an eyesore when speaking with their current landlord.

In 1957, O'Malley acquired the Los Angeles Angels, formerly the farm club of the Chicago Cubs, and their ballpark. The stage was thus set for a grand exchange between local government and the Dodgers. The real-estate terms (setting aside complex monetary commitments on both sides) were that the team would convey the Angels' "little Wrigley Field" to the city in return for fee simple title to up to three hundred acres in the Ravine, complete with public promises to contract freeway-access improvements.

The economics, wisdom, and legality of the swap were all exposed to intense public scrutiny. After all, the voters in 1955 had rejected a bond proposal to use public funds for a ballpark on the very site. Petitions were circulating calling for a public vote on the Dodgers transaction—though the biggest detractors were owners of the San Diego Padres minor-league club and other competing businesses, not the representatives of the evicted residents. Separate lawsuits alleged that the deal exceeded the city council's authority and was unconstitutional, and two superior courts ruled in the plaintiffs' favor. But the voters narrowly endorsed the exchange in a June 1958 referendum, after a pro-Dodger telethon featuring Debbie Reynolds, Dean Martin, Jerry Lewis, and Ronald Reagan. Likewise, in 1959 the California Supreme Court reversed the lower court decisions, and the U.S. Supreme Court declined to review the case.[28](#)

Many developers find that the entitlements process—the securing of rights to pursue the projects from public authorities and from businesses affected by the development—is the largest challenge for the viability and cost of an urban project. Remaining properties not owned by the city, appraised at \$93,000, wound up requiring more than half a million dollars to acquire; the West Coast minor-league clubs demanded and received compensation for the Giants' and Dodgers' entry into their markets. Unexpectedly high rent needed to be paid for the Los Angeles Coliseum while the new stadium was being built. O'Malley found the interest rate and closing fees quoted by Los Angeles banks for the construction loans to be unattractive. The delays and logistical challenges of construction also complicated the financing of the new venue.

Help arrived from an unlikely source, the advertising appetite of Union Oil Company of California. The company's chairman, Reese Taylor, had been instrumental in the success of the "Bring Baseball to Los Angeles" drive. Union Oil became prime lender, advancing \$8 million (interest-free and payment-free for the first two years) in return for broadcasting and publicity rights and—a natural in Southern California—a franchise for a Union 76 gasoline service station in the parking lot.[29](#)

The new "field of liens" was certainly more favorable for the club than was the mortgaged old park in Flatbush. The Union Oil arrangement illustrates the capability of a sports asset to generate revenue far beyond that gleaned from onsite visitors. It bears many characteristic aspects of ballpark development: an enthusiastic booster of civic pride, and of the game itself, had offered above-market value to be affiliated with the ballclub, the venue, and their associated media and transportation rights.

O'Malley's field was touted as the "last privately built baseball park"[30](#) until the completion of the San Francisco Giants' new stadium in 2000. It was conceived in a favorable property exchange and nurtured with generous commercial terms, all bestowed on an eagerly coveted market entrant. In any event, the park's design is undeniably classic. Of the facilities built in its era, the colorful Dodger Stadium most retains its appeal for players and spectators.[31](#)

In the park's inaugural 1962 season, the Dodgers sold a major-league record 2.7 million tickets and continued their position as one of the stronger sports franchises. Walter O'Malley's son Peter became president in 1970; Walter died in 1979 and was inducted into the Hall of Fame in 2008. The O'Malley family sold the team in 1997 to Rupert Murdoch's News Corporation, which justified the acquisition as a source of content for its widespread media outlets, particularly in Asia.[32](#) The ownership of the club and its stadium is currently in dispute but is generally tied up with the family of Frank McCourt, who is by profession a real-property developer.

The Dodgers' move from Brooklyn to Los Angeles had effects in a number of economic, political, and legal dimensions. Scholars have noted that it anticipated the "issues that dominate contemporary stadium politics . . . public versus private development, eminent domain, competing economic development strategies, neighborhood resistance and fragmented local political processes."[33](#) As illustrated above, many of these issues come up in other forms of high-stakes real-estate development. The signal differences between ballparks and other properties are rather less tangible: the capacity for producing value from afar through media both old and new, and the deeply rooted emotions and memories that connect communities and generations through sport.

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### Author's Note

This article was published originally in *The 2010 Green Bag Almanac and Reader*, 346–55. The title of this article pays tribute to an article by Matt Smith in *San Francisco Weekly* (October 30, 2002) about an ill-fated minor-league stadium.

### Notes

[1](#) Several economists have questioned the value of sports clubs to cities and the wisdom of government policies designed to attract or retain them. See Roger G. Noll and Andrew S. Zimbalist, eds., *Sports, Jobs, and Taxes: The Economic Impact of Sports Teams and Stadiums* (Washington, D.C.: Brookings Institution Press, 1997). Such policies have nonetheless proven resilient for decades.

[2](#) See, among many published sources with many more details than are covered here, Michael D'Antonio, *Forever Blue: The True Story of Walter O'Malley, Baseball's Most Controversial Owner, and the Dodgers of Brooklyn and Los Angeles* (New York: Riverhead Books, 2009); Michael Shapiro, *The Last Good Season: Brooklyn, the Dodgers, and Their Final Pennant Race Together* (New York: Doubleday, 2003); Doris Kearns Goodwin, *Wait Till Next Year: A Memoir* (New York: Simon and Schuster, 1997); Carl E. Prince, *Brooklyn's Dodgers: The Bums, the Borough, and the Best of Baseball, 1947–1957* (New York: Oxford University Press, 1996); Neil J. Sullivan, *The Dodgers Move West* (New York: Oxford University Press, 1987); Peter Ellsworth, "The Brooklyn Dodgers' Move to Los Angeles: Was Walter O'Malley Solely Responsible?" *Nine* 14, no. 1 (2005): 19–40. For its part, the O'Malley family has sponsored its own web site, [www.walteromalley.com](http://www.walteromalley.com), with photographs, audio clips, and documents; D'Antonio was granted access to additional family archives for his work cited above.

[3](#) Also nicknamed the Trolley Dodgers, the Dodgers, the Robins, the Bridegrooms and the Superbas, before they paid homage to their trolley-car environment and settled down as the Dodgers. The name is as inapposite in their adopted city as are those of basketball's Los Angeles Lakers and Utah Jazz.

[4](#) See generally Rita Seiden Miller, ed., *Brooklyn USA: The Fourth Largest City in America* (Brooklyn: Brooklyn College Press, 1979); David McCullough, *The Great Bridge* (New York: Simon and Schuster, 1972).

[5](#) Red Barber, *Rhubarb Patch: The Story of the Modern Brooklyn Dodgers* (New York: Simon and Schuster, 1954), 31.

[6](#) D'Antonio, 34.

[7](#) D'Antonio, 36; Ellsworth, 20.

[8](#) See Andy McCue, "[Walter O'Malley](#)," Society for American Baseball Research, Baseball Biography Project (accessed 29 November 2010).

[9](#) D'Antonio, 90; Ellsworth, 20.

[10](#) The cross-town rivals depended to a great degree on their intra-city contests. The Giants' 11 annual home games against the Dodgers generated fully one-third of the team's revenues from all of its 77 home games. Goodwin, 223.

[11](#) Decades later, the environmental-impact report and analysis for the new Giants ballpark in San Francisco required detailed studies of patterns of traffic on surface streets and highway on-ramps and off-ramps, and justifications for the omission from the project of a new parking garage. The stadium features access by railroad, rapid transit and municipal transit, bicycle racks, and even ferry service. See Metropolitan Transportation Commission, "Bay Area: A Showcase for Public Transit" (September/ October 2000), available at [www.mtc.ca.gov/news/transactions](http://www.mtc.ca.gov/news/transactions) (accessed 29 November 2010).

[12](#) See Roger Kahn, *The Boys of Summer* (New York: Harper and Row, 1972), xv. "Ebbets Field was located miles away from any expressway and, with insufficient rail facilities and limited parking, did not have the amenities necessary for a thriving ballpark." See Ellsworth, 22. See also Edward G. White, *Creating the National Pastime: Baseball Transforms Itself, 1903–1953* (Princeton: Princeton University Press, 1996), 46.

[13](#) D'Antonio, 250. Home attendance during the Dodgers' pennant-winning 1955 and 1956 seasons averaged only 16,000 per game.

[14](#) Quoted in Shapiro, 73. See also David W. Chen, "Nothing Sub About Us, Suburban Fans Say," *New York Times*, October 23, 2000 (most fans attending the 2000 Mets–Yankees "Subway Series" arrived by car).

[15](#) "Similar profits at that time certainly convinced the large American car companies that they had nothing to worry about. The difference in management foresight was apparent a decade later. ... O'Malley was basking in higher profits in the Los Angeles sunshine because he had recognized that his 1950s profits cloaked problems that needed to be solved." See McCue, "Walter O'Malley."

[16](#) "O'Malley was unquestionably a shrewd businessman unaffected by sentiment in his operation of the Dodgers, but he did not scheme to move the Dodgers to Los Angeles. ...

[He] did not move the [team] until it became evident that a stadium was not going to be built in New York.” See Ellsworth, 35. He expected the city to condemn the land and build the stadium, but was prepared to pay significant rentals and gross receipt royalties. See D’Antonio.

[17](#) Shapiro; Goodwin, 223. The designs were published in magazines such as *Collier’s* and *Mechanix Illustrated*. See Ellsworth, 24–25. Photographs of a retractable-dome sketch, and of Fuller and O’Malley with geodesic-dome models, are available at [walteromalley.com](http://walteromalley.com).

[18](#) See generally Robert A. Caro, *The Power Broker: Robert Moses and the Fall of New York* (New York: Knopf, 1974). For fifty years, Moses oversaw almost every major improvement in the city, including the United Nations Headquarters and Lincoln Center, displacing some half-million residents in the process. His official titles included New York Parks commissioner and head of the Triborough Bridge and Tunnel Authority, Construction Commission and Slum Clearance Committee.

[19](#) According to Caro, Moses had envisioned a baseball park in Flushing Meadows “since the 1930s, if not the 1920s.” Zack O’Malley Greenburg, “Who Framed Walter O’Malley?” *Forbes*, 14 April 2009. Shea Stadium opened in 1964 as the first permanent home of the New York Mets, bearing the color blue for the departed Dodgers and the color orange for the departed Giants. Shea has been replaced with Citi Field, whose exterior is designed in turn to resemble that of Ebbets.

[20](#) Housing Act of 1949, Pub. L. No. 81-171, tit. I, § 110(c), 63 Stat. 413 (1949).

[21](#) *Berman v. Parker*, 348 U.S. 26 (1954); *Kelo v. City of New London*, 545 U.S. 469 (2005).

[22](#) Sites may have been available in the Bedford-Stuyvesant and Brownsville districts, which O’Malley rejected, possibly on grounds of the neighborhoods’ economic and racial makeup. On one of his preferred locations, at Flatbush and Atlantic, the new Barclays Center basketball stadium designed by Ellerbe Becket is being built. The recent backlash against Moses rather than O’Malley as the proximate cause of Brooklyn’s loss of the Dodgers, see Shapiro, may be overstated. The Dodgers had lukewarm support throughout the city government. “[Moses] may have been right to argue that a privately owned baseball stadium for a privately owned baseball team did not conform to the ‘public purpose’ and should not have been even partly financed with federal funds.” David Nasaw, “Hitler, Stalin, O’Malley and Moses,” *New York Times*, May 25, 2003 (review of Shapiro).

[23](#) Reactions expressing betrayal are legion. Three samples will suffice: “In the hearts of Brooklyn fans, O’Malley had secured his place in a line of infamy which now crossed the centuries from Judas Iscariot to Benedict Arnold to Walter F. O’Malley. Effigies of the Dodgers owner were burned on the streets of Brooklyn.” Goodwin, *supra* note 2, at 226.

“O’Malley’s reputation only worsens with the passage of time. There is no loss of emotion even in the twenty-first century. Such perpetuation of emotional loss into the next generation suggests just how strong the symbolic relationship between Brooklyn and the Dodgers was.” Ellsworth, 35. “The Dodgers were more than a business. They represented a cultural totem, a tangible symbol of the community and its values.” Sullivan, 18.

[24](#) See D’Antonio, 250; Greenburg.

[25](#) For artists’ impressions of the district’s social culture, see Don Normark, *Chávez Ravine, 1949* (2003); Ry Cooder, *Chávez Ravine* (Nonesuch Records, 2005); Lynn Becker, *Architecture Chicago Plus* (review of Cooder’s “ballads of ChavezRavine”), available at [arcchicago.blogspot.com](http://arcchicago.blogspot.com) (accessed November 29, 2010).

[26](#) See “Public Housing and the Brooklyn Dodgers: Los Angeles, Double Play by City Hall in the Ravine,” *Frontier*, June 1957, available at [www.library.ucla.edu/libraries/special/scweb](http://www.library.ucla.edu/libraries/special/scweb) (accessed 29 November 2010).

[27](#) A documentary film narrated by Cheech Marin, *Chávez Ravine: A Los Angeles Story* (Bullfrog Films 2003), includes footage of the evictions. On condemnation for sports facilities generally, see Tyson E. Hubbard, “For the Public’s Use? Eminent Domain in Stadium Construction,” *Sports Law. J.* 15 (2008): 173.

[28](#) See Cary S. Henderson, “Los Angeles and the Dodger War, 1957–62,” *S. Cal. Q.* (fall 1980): 261–86 (detailed description of terms and negotiations); *City of Los Angeles v. Superior Court*, 51 Cal. 2d 423, 333 P.2d 745, cert. denied, 361 U.S. 30 (1959).

[29](#) D’Antonio, 289–90.

[30](#) Steven A. Riess, “Historical Perspectives on Sports and Public Policy,” in *The Economics and Politics of Sports Facilities*, ed. Wilbur C. Rich (Westport, Conn.: Quorum Books, 2000), 30.

[31](#) “From dugout seats to in-stadium restaurants, to a message board to terraced parking lots removing the need for people to climb stairs or ramps to their seats, Dodger Stadium was full of new ideas. It was the first large baseball stadium built without pillars that blocked the view from some seats.” McCue, “Walter O’Malley.”

[32](#) See Robert V. Bellamy Jr. and James R. Walker, “Whatever Happened to Synergy? MLB as Media Product,” *Nine* 13, no. 2 (2005): 19–30; Sallie Hofmeister, “Deal Shows Use of Teams to Build a Global TV Empire,” *Los Angeles Times*, March 20, 1998; Sallie Hofmeister, “Murdoch Deal Sets Stage for Fox Challenge to ESPN,” *Los Angeles Times*, June 24, 1997.

[33](#) Riess, 29, citing Charles C. Euchner, *Playing the Field: Why Sports Teams Move and Cities Fight to Keep Them* (Baltimore: Johns Hopkins University Press, 1993), 19.