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13 Attorneys for Plaintiff and the Class

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 15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 FAITH BAUTISTA, Individually and on
 Behalf of All Others Similarly Situated,

19 Plaintiff,

20 vs.

21 VALERO MARKETING AND SUPPLY
 22 COMPANY,

23 Defendant.

) Case No. 3:15-cv-05557-RS

) CLASS ACTION

) **DECLARATION OF CHRISTOPHER C.
) GOLD IN SUPPORT OF PLAINTIFF'S
) UNOPPOSED MOTION FOR
) PRELIMINARY APPROVAL OF CLASS
) ACTION SETTLEMENT**

1 I, Christopher C. Gold, declare as follows:

2 1. I am an attorney admitted to practice in the state of Florida and *pro hac vice* before
3 this Court. I am a partner with the law firm Robbins Geller Rudman & Dowd LLP and counsel for
4 Plaintiff Faith Bautista (“Plaintiff”) in this action. I submit this Declaration in support of Plaintiff’s
5 Unopposed Motion for Preliminary Approval of Class Action Settlement. I have personal
6 knowledge of the facts stated herein and, if called to testify, I could and would competently testify
7 thereto.

8 2. The Settlement Agreement between Plaintiff and Valero Marketing and Supply
9 Company (“Valero”) is the result of extensive arm’s-length negotiations, expert input, and
10 cooperative efforts to finalize the terms, develop a notice plan, and prepare and finalize the exhibits
11 and motion to direct notice to the Class.

12 3. The proposed settlement (“Settlement”) was negotiated by proposed class counsel
13 with extensive experience in consumer class action litigation (“Class Counsel”). *See Exhibit A*
14 (Robbins Geller Rudman & Dowd LLP Firm Resume); **Exhibit B** (Hobson Bernardino + Davis
15 LLP Firm Resume).

16 4. Based on the experience of Class Counsel, the Settlement directly resolves the
17 claims in this action and provides exceptional results for the Class while sparing the Class from the
18 uncertainties of continued and protracted litigation.

19 5. The parties did not begin negotiations until after the Court certified a class under
20 Rule 23(b)(3) of the Federal Rules of Civil Procedure and they well understood the strengths and
21 weaknesses of their respective positions. And the parties did not begin discussing attorneys’ fees
22 or a service award until after reaching agreement on the substantive terms of the Settlement.

23 6. Before filing this action, Class Counsel independently investigated the facts and law,
24 and coordinated with other plaintiffs’ counsel who were considering filing a complaint.

25 7. By the time the parties finally reached agreement, they had conducted extensive
26 discovery, worked with experts, engaged in significant motion practice, and were preparing to brief
27 Plaintiff’s appeal of this Court’s decertification Order to the Ninth Circuit.

28

1 8. Before the Settlement was reached, Class Counsel reviewed thousands of pages of
2 documents, including documents produced pursuant to a motion to compel that was fully briefed
3 and argued. Class Counsel also worked with Plaintiff to respond to 11 interrogatories and nine
4 document requests, which involved collecting records from third-parties and considerable follow
5 up.

6 9. Before the Settlement was reached, Class Counsel took five hybrid Rule 30(b)(6)
7 and Rule 30(b)(1) depositions of Valero employees, two depositions of third-parties (a Valero
8 distributor representative and a Valero-branded station representative), one deposition of Valero's
9 damages expert, and one deposition of Valero's Google Maps expert. Class Counsel also defended
10 the deposition of Plaintiff, the deposition of consumer survey expert Michael Kamins, two
11 depositions of damages expert Sidney Blum, and one deposition of Plaintiff's investigator.

12 10. Before the Settlement was reached, Class Counsel vigorously prosecuted this case,
13 briefing two motions to dismiss, two discovery motions, a class certification motion, six *Daubert*
14 motions and a motion to strike *Daubert* objections, a hotly contested motion to notice the Class and
15 to amend the scheduling Order, a class decertification motion, cross-motions for summary
16 judgment, multiple motions for reconsideration, and a successful petition to the Ninth Circuit under
17 Fed. R. Civ. P. 23(f).

18 11. On March 4, 2019, Valero filed an answer to Plaintiff's Rule 23(f) petition with the
19 Ninth Circuit seeking to appeal this Court's class decertification Order.

20 12. On June 26, 2019, the Ninth Circuit granted Plaintiff's Rule 23(f) petition.

21 13. On September 17, 2019, the Ninth Circuit vacated the briefing schedule on
22 Plaintiff's appeal pending the parties' settlement discussions.

23 14. As part of these litigation efforts, Class Counsel advanced over \$500,000 in
24 litigation expenses on behalf of the Class, with no assurance that those expenses would be
25 reimbursed. Class Counsel's combined lodestar to date is \$7,621,422.80.

26 I declare under penalty of perjury under the laws of the United States of America that the
27 foregoing is true and correct to the best of my knowledge and understanding.

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1 Executed this 30th day of September,
2 2020.

3 By: /s/ Christopher C. Gold
4 Christopher C. Gold

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EXHIBIT A

Robbins Geller
Rudman & Dowd LLP



Stuart A. Davidson

Partner

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Practice Areas

Consumer Fraud and Privacy
Corporate Takeover
Shareholder Derivative
Whistleblower

Education

Nova Southeastern University
Shepard Broad College of Law, J.D.,
1996, *summa cum laude*

- Graduated in the top 3% of his class
- Associate Editor, *Nova Law Review*
- Recipient of Book Awards (highest grade) in Trial Advocacy, International Law, and Criminal Pretrial Practice

State University of New York at
Geneseo, B.A., 1993, Political
Science

Honors & Awards

Leading Plaintiff Financial Lawyer,
Lawdragon, 2020

Stuart Davidson is a partner in Robbins Geller Rudman & Dowd LLP's Boca Raton office. His practice focuses on complex consumer class actions, including cases involving deceptive and unfair trade practices, privacy and data breach issues, and antitrust violations.

Stuart has served as class counsel in some of the nation's most significant privacy cases, including: *In re Facebook Biometric Information Privacy Litigation*, No. 3:15-cv-03747-JD (N.D. Cal.) (\$650 million recovery (pending approval), a cutting-edge class action concerning Facebook's alleged privacy violations through its collection of user's biometric identifiers without informed consent); *In re Yahoo! Inc. Customer Data Security Breach Litigation*, No. 5:16-md-02752-LHK (N.D. Cal.) (\$117.5 million recovery in the largest data breach in history); *In re Sony Gaming Networks & Customer Data Security Breach Litigation*, No. 3:11-md-02258-AJB-MDD (S.D. Cal.) (settlement valued at \$15 million concerning the massive data breach of Sony's PlayStation Network); and *Kehoe v. Fidelity Federal Bank & Trust*, No. 9:03-cv-80593-DTKH (S.D. Fla.) (\$50 million recovery in Driver's Privacy Protection Act case on behalf of half-a-million Florida drivers against a national bank).

Stuart currently serves as Plaintiffs' Co-Lead Counsel in *In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation*, No. 2:19-md-02904-MCA-MAH (D.N.J.) (representing class of LabCorp customers), on Plaintiffs' Steering Committee in *In re Intel Corp. CPU Marketing, Sales Practices and Products Liability Litigation*, No. 3:18-md-02828-SI (D. Or.) (representing class of Intel CPU purchasers based on serious security vulnerabilities – including those known as “Spectre”

and “Meltdown” – that infect nearly all of Intel’s x86 processors manufactured and sold since 1995), and spearheads several aspects of *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices & Antitrust Litigation*, No. 2:17-md-02785-DDC-TJJ (D. Kan.) (representing certified class for RICO and antitrust claims involving the illegal monopolization of the epinephrine auto-injector market, which allowed the prices of the life-saving EpiPen to rise over 600% in 9 years).

Stuart also served as Plaintiffs’ Co-Lead Counsel in *In re NHL Players’ Concussion Injury Litigation*, No. 0:14-md-02551-SRN-BRT (D. Minn.) (representing retired National Hockey League players in multidistrict litigation suit against the NHL regarding injuries suffered due to repetitive head trauma and concussions), and in *In re Pet Food Products Liability Litigation*, No. 1:07-cv-02867-NLH-AMD (D.N.J.) (\$24 million recovery in multidistrict consumer class action on behalf of thousands of aggrieved pet owners nationwide against some of the nation’s largest pet food manufacturers, distributors, and retailers). He also served as Plaintiffs’ Co-Lead Counsel in *In re UnitedGlobalCom, Inc. Shareholder Litigation*, C.A. No. 1012-VCS (Del. Ch.) (\$25 million recovery weeks before trial); *In re Winn-Dixie Stores, Inc. Shareholder Litigation*, No. 16-2011-CA-010616 (Fla. Cir. Ct.) (\$11.5 million recovery for former Winn-Dixie shareholders following the corporate buyout by BI-LO); and *In re AuthenTec, Inc. Shareholder Litigation*, No. 5-2012-CA-57589 (Fla. Cir. Ct.) (\$10 million recovery for former AuthenTec shareholders following a merger with Apple). The latter two cases are the two largest merger and acquisition recoveries in Florida history.

Some of Stuart’s notable cases include: *In re EpiPen (Epinephrine Injection, USP) Mktg., Sales Pracs. & Antitrust Litig.*, No. 17-md-2785-DDC-TJJ, 2020 WL 1180550 (D. Kan. Mar. 10, 2020); *In re Solara Med. Supplies, LLC Customer Data Sec. Breach Litig.*, No. 3:19-cv-2284-H-KSC, 2020 WL 2214152 (S.D. Cal. May 7, 2020); *Gardner v. Starkist Co.*, 418 F. Supp. 3d 443 (N.D. Cal. 2019); *Skochin v. Genworth Life Ins. Co.*, 413 F. Supp. 3d 473 (E.D. Va. 2019); *Patel v. Facebook, Inc.*, 932 F.3d 1264 (9th Cir. 2019); *Dolan v. JetBlue Airways Corp.*, 385 F. Supp. 3d 1338 (S.D. Fla. 2019); *Stafford v. Rite Aid Corp.*, No. 3:17-cv-1340-AJB-JLB, 2018 WL 4680043

(S.D. Cal. Sept. 28, 2018); *Dent v. NFL*, 902 F.3d 1109 (9th Cir. 2018); *Friedman v. AARP, Inc.*, 283 F. Supp. 3d 873 (C.D. Cal. 2018); *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, No. 16-MD-02752-LHK, 2017 WL 3727318 (N.D. Cal. Aug. 30, 2017); *Friedman v. AARP, Inc.*, 855 F.3d 1047 (9th Cir. 2017); *Evans v. Ariz. Cardinals Football Club LLC*, No. C 16-01030 WHA, 2016 U.S. Dist. LEXIS 86207 (N.D. Cal. July 1, 2016); *In re NHL Players' Concussion Injury Litig.*, 189 F. Supp. 3d 856 (D. Minn. 2016); *In re NHL Players' Concussion Injury Litig.*, MDL No. 14-2551 (SRN), 2015 U.S. Dist. LEXIS 38755 (D. Minn. Mar. 25, 2015); *Dumont v. Litton Loan Servicing, LP*, No. 12 Civ. 2677 (ER), 2015 U.S. Dist. LEXIS 29787 (S.D.N.Y. Mar. 11, 2015); *Lesti v. Wells Fargo Bank, N.A.*, 960 F. Supp. 2d 1311 (M.D. Fla. 2013); *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.*, 903 F. Supp. 2d 942 (S.D. Cal. 2012); *In re Clorox Consumer Litig.*, 894 F. Supp. 2d 1224 (N.D. Cal. 2012); *In re Compellent Techs, Inc. S'holder Litig.*, No. 6084-VCL, 2011 WL 6382523 (Del. Ch. Dec. 9, 2011); *All Family Clinic of Daytona Beach, Inc. v. State Farm Mut. Auto. Ins. Co.*, 448 F. App'x 906 (11th Cir. 2011); *In re Pet Food Prods. Liab. Litig.*, 629 F.3d 333 (3d Cir. 2010); *Penzer v. Transp. Ins. Co.*, 605 F.3d 1112 (11th Cir. 2010); *Penzer v. Transp. Ins. Co.*, 29 So. 3d 1000 (Fla. 2010); *Frankle v. Best Buy Stores, L.P.*, 609 F. Supp. 2d 841 (D. Minn. 2009); *In re NationsRent Rental Fee Litig.*, No. 06-60924-CIV, 2009 WL 636188 (S.D. Fla. Feb. 24, 2009); *Neighborhood Health P'ship, Inc. v. Peter F. Merkle, M.D., P.A.*, 8 So. 3d 1180 (Fla. Dist. Ct. App. 2009); *Tampa Serv. Co. v. Hartigan*, 966 So. 2d 465 (Fla. Dist. Ct. App. 2007); *Kehoe v. Fid. Fed. Bank & Trust*, 421 F.3d 1209 (11th Cir. 2005); and *In re JCC Holding Co. S'holder Litig.*, 843 A.2d 713 (Del. Ch. 2003).

Stuart is a former lead assistant public defender in the Felony Division of the Broward County, Florida Public Defender's Office. During his tenure at the Public Defender's Office, he tried over 30 jury trials and defended individuals charged with major crimes ranging from third-degree felonies to life and capital felonies. He has been quoted in numerous major media outlets regarding his cases, including *The New York Times*, *The Washington Post*, *USA Today*, *U.S. News & World Report*, *New York Daily News*, the *South Florida Sun-Sentinel*, the *Boston Globe*, the *Miami Herald*, *The Globe & Mail*, and *Law360*, and is a frequent speaker at

conferences involving class action practice and procedure.

Stuart has been named a Leading Plaintiff Financial Lawyer by *Lawdragon*. He is a member of the Sedona Conference Working Group 11 Brainstorming Group, focusing on the California Consumer Protection Act and defining and measuring damages under the U.S. privacy laws. He earned his Bachelor of Arts degree in Political Science from the State University of New York at Geneseo. Stuart earned a Juris Doctor degree from the Nova Southeastern University Shepard Broad College of Law, where he graduated *summa cum laude* in the top 3% of his class. While in law school he was the Associate Editor for the *Nova Law Review* and was the recipient of Book Awards (highest grade) in Trial Advocacy, International Law, and Criminal Pretrial Practice.

Professional Affiliations

- Member, Sedona Conference Working Group 11 Brainstorming Group

Featured Seminars & Speaking Engagements

- Strafford CLE Webinar, *Sports-Related Class Actions: Navigating the Minefield of Class Certification and Federal Labor Laws* (Nov. 15, 2018)
- HB Litigation Conferences' Consumer Class Actions: *Attorneys' Fees*, San Juan, Puerto Rico (May 5, 2016)
- HB Litigation Conferences' Data Breach & Privacy Litigation Conference 2016: *Recent Settlements and the Picture They Paint*, San Francisco, California (Feb. 11, 2016)

Admissions

- Florida
- Minnesota
- United States Supreme Court
- United States Courts of Appeals for the Second, Third, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits

- United States District Courts for the Northern, Middle, and Southern Districts of Florida
- United States District Court for the Northern District of Illinois
- United States District Courts for the Northern and Southern Districts of Indiana
- United States District Court for the Eastern District of Michigan
- United States District Court for the Northern District of New York
- United States District Courts for the Northern and Southern Districts of Texas

Robbins Geller
Rudman & Dowd LLP



Christopher C. Gold

Partner

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Practice Areas

Consumer Fraud and Privacy

Securities Fraud

Shareholder Derivative

Education

- DePaul University College of Law, J.D., 2010
- Lynn University, B.S., Business, 2006

Admissions

Florida

United States District Courts for the Middle and Southern Districts of Florida

United States District Court for the Eastern District of Michigan

United States District Court for the Southern District of Texas

Honors & Awards

Rising Star, *Super Lawyers Magazine*, 2019-2020

Christopher Gold is a partner in Robbins Geller Rudman & Dowd LLP's Boca Raton office. His practice focuses on mass tort and class action litigation involving consumer fraud, privacy and data breach issues, and securities fraud. He has successfully recovered millions of dollars on behalf of clients.

Christopher currently serves on the Plaintiffs' Steering Committee in *In re Allergan Biocell Textured Breast Implant Prods, Liab. Litig.* (D.N.J.). Christopher also serves on the Law and Briefing and Government Entity Committees in *In re Juul Labs, Inc. Mktg., Sales Prods., & Prods. Liab. Litig.* multidistrict litigation, where he represents the School Boards of Broward County and Miami-Dade County, Montgomery County, Maryland, and other government entities seeking damages caused by the public nuisance of youth e-cigarette use in those communities. He also currently serves on the Class and Discovery committees in *In re Zantac (Ranitidine) Prods. Liab. Litig.* (S.D. Fla.).

Christopher was part of the trial team in *In re Facebook Biometric Info. Priv. Litig.* (N.D. Cal.), a landmark case under the Illinois Biometric Information Privacy Act (BIPA) that obtained a \$650 million settlement, subject to court approval, on behalf of Facebook users in Illinois whose biometric information was collected without written consent.

Christopher was also part of the team that achieved a settlement valued at \$15 million in *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.* (S.D. Cal.), a case that arose from a massive data breach of Sony's PlayStation Network.

In the securities fraud space, Christopher currently represents institutional investors who are claimants in arbitration proceedings pending in the Market Arbitration Chamber of the Securities and Exchange Commission of Brazil (CVM). Previously, Christopher helped achieve a \$15 million settlement in *Boland v. Gerdau S.A.* (S.D.N.Y.) on behalf of investors in a Brazilian steel conglomerate that failed to disclose its alleged bribery of Brazilian tax authorities. In *In re Winn-Dixie Stores, Inc. S'holder Litig.* (Fla. 4th Cir. Ct.), Christopher helped to achieve a \$9 million settlement for former Winn-Dixie shareholders whose stock was undervalued in a buyout of the company. And in *In re AuthenTec, Inc. S'holder Litig.* (Fla. 18th Cir. Ct.), he helped to achieve a \$10 million settlement on behalf of the former shareholders of AuthenTec following its buyout by Apple, which incorporated AuthenTec's fingerprint technology into the Apple iPhone.

Christopher has been recognized as a Super Lawyer Rising Star for the past two years. He earned a Bachelor of Science degree in Business Administration from Lynn University and a Juris Doctor degree from DePaul University College of Law.

Christopher is fluent in Brazilian Portuguese.

EXHIBIT B

Rafael Bernardino, Jr., is a partner with the Law Firm of Hobson, Bernardino & Davis, LLP in Los Angeles, California. He is a Member of the State Bar of California and was former Police Commissioner for the City of Los Angeles.

Mr. Bernardino graduated from the University of Southern California in 1981 and from the University of Southern California, Gould School of Law in 1984, where he was a member of the Law Review. Upon graduation, Mr. Bernardino clerked for The Honorable Manuel L. Real, then Chief Judge of the United States District Court for the Central District of California.

After completion of his judicial clerkship, Mr. Bernardino joined the well-respected law firm of Adams, Duque & Hazeltine, and later was associated with the Wyman, Bautzer law firm. After completing several high-profile cases at the Wyman, Bautzer law firm (and its successor), Mr. Bernardino left private practice and became an Attorney Adviser in the United States Department of Justice Office of Intelligence Policy in Washington, D.C. During his tenure there, Mr. Bernardino advised two United States Attorneys General, the Hon. Edwin Meese and the Hon. Richard Thornburgh on matters of national security and intelligence policy.

Thereafter, Mr. Bernardino founded the Los Angeles office of Hornblower, Manning, Ward & Bernardino, P.C. The Hornblower law firm, headquartered in Texas, was a good match for Mr. Bernardino's burgeoning practice because Hornblower represented large energy companies, such as Koch Industries, Inc., and through his own efforts, Mr. Bernardino had become one of the most significant outside legal counsel to ARCO. Now a Partner with the law firm of Hobson, Bernardino & Davis, LLP, Mr. Bernardino has practiced as a trial lawyer in the areas of criminal law, securities law, professional liability, intellectual property and environmental law. The bulk of Mr. Bernardino's trial practice was in the area of complex business litigation and environmental law, representing both individuals and entities being investigated for, or charged with, violation of federal, state and local civil and criminal laws. As an attorney in private practice, Mr. Bernardino has represented significant private and public entities, including but not limited to, The Walt Disney Company, J-M Manufacturing Company, Pacific Gas & Electric Company, the Los Angeles Department of Water & Power, the Christian Broadcasting Network, Inc. and the Presbyterian Synod of California and Hawaii.

Mr. Bernardino is admitted to practice before all Courts in the State of California, including the United States District Courts for Central, Southern, Eastern and Northern Districts and the Ninth Circuit Court of Appeals. Additionally, in the course of his practice, Mr. Bernardino has been admitted to practice, *pro hac vice*, in state and federal courts in Texas, Michigan, Nevada and Kansas. Among other experience, Mr. Bernardino is co-counsel for Petitioners in a series of cases in the United States District Court for the Central District of California, the Ninth Circuit Court of Appeals, and the United States Supreme Court styled *Independent Living Center of Southern California, et al., v. Richard Figueroa, Jr., Acting Director of Department of Health Care Services of the State of California*, Case No. CV 08-3315-CAS (MAN), and related cases ("ILC Litigation.") Among other things, the ILC Litigation resulted in the delivery of approximately \$3 billion in healthcare to 6.7 million poor, sick and disabled Californians. See, *Douglas v. Indep. Lvg. Ctr. of S. Cal.*, 565 U.S. 606 (2012); *Independent Living Center of Southern California v. Shewry*, 543 F.3d 1047 (9th Cir. 2008);

Independent Living Center of Southern California v. Shewry, 543 F.3d 1050 (9th Cir.), cert. denied, 557 U.S. 920 (2009); *Independent Living Center of Southern California v. Shewry*, 590 F.3d 725 (9th Cir. 2009), vacated on other grounds sub. nom. *Douglas v. Independent Living Center of Southern California, Inc.*, 565 U.S. 606 (2012); *Independent Living Center of Southern California v. Maxwell-Jolly*, 572 F.3d 644 (9th Cir. 2009); and *Independent Living Center of Southern California v. Kent*, 909 F.3d 272 (9th Cir. 2018).

In addition to practicing law, Mr. Bernardino has been an Adjunct Professor and Guest Lecturer at Loyola Law School, Glendale College of Law, American Intercontinental University and Westwood College. Mr. Bernardino is also active in a variety of civic and local charitable organizations and was previously Commissioner of the Proposition “Q” Citizen Oversight Commission, responsible for the construction of Police, Fire and paramedic facilities in the City of Los Angeles. Additionally, Mr. Bernardino previously served as Commissioner on the Los Angeles Police Commission and as Commissioner to the Los Angeles Fire and Police Pension Board. Mr. Bernardino is fluent in Spanish; and, is active in a variety of charitable institutions supporting the University of Southern California, the City of Hope, the Filipino American Service Group, Last Chance for Animals, the Boys and Girls Club of Los Angeles and the Humane Society. Mr. Bernardino is a Member of the Federal Bar Association and the Mexican-American Bar Association. Mr. Bernardino is also a Member of the California Club and a participant in the Renaissance Weekend organization.