

**Señor:**  
**JUEZ 3 CIVIL MUNICIPAL DE FUSAGASUGÁ**  
 E. S. D

**REF: EJECUTIVO PARA LA EFECTIVIDAD DE LA GARANTIA REAL**  
**RADICADO: 2020 – 529**  
**DE: FONDO NACIONAL DEL AHORRO**  
**CONTRA: WALTER ANDRES CARDENAS MENDOZA Y OTRO**  
**ASUNTO: LIQUIDACION CREDITO**

**JOSE IVAN SUAREZ ESCAMILLA**, mayor de edad y vecino de ésta ciudad, identificado con la cédula de ciudadanía número 91.012.860, abogado en ejercicio con tarjeta profesional número 74502 del C.S.J. actuando como apoderado de la parte Actora, de manera respetuosa, aporto **LIQUIDACIÓN DEL CRÉDITO** acatando el contenido del art. 446 del C.G.P., de conformidad con las pretensiones de la demanda y el mandamiento de pago de la siguiente forma:

| <b>PAGARE No 82393773</b>                   |              |             |                 |                        |                           |
|---|--------------|-------------|-----------------|------------------------|---------------------------|
| <b>CAPITAL ACELERADO EN UVR´S</b>           |              |             |                 | <b>27.765,0598</b>     |                           |
| <b>VALOR UVR´S A 06 DE JUNIO DEL 2022</b>   |              |             |                 | <b>308,7117</b>        |                           |
| <b>CAPITAL ACELERADO CONVERTIDO A PESOS</b> |              |             |                 | <b>\$ 8.571.398,81</b> |                           |
| <b>FECHA</b>                                |              | <b>DÍAS</b> | <b>CAPITAL</b>  | <b>MORA ANUAL</b>      | <b>INTERÉS MORATORIOS</b> |
| <b>DESDE</b>                                | <b>HASTA</b> |             |                 |                        |                           |
| 18-dic.-20                                  | 31-dic.-20   | 14          | \$ 8.571.391,81 | 8,94%                  | \$ 28.643,17              |
| 1-ene.-21                                   | 31-ene.-21   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-feb.-21                                   | 28-feb.-21   | 28          | \$ 8.571.391,81 | 8,94%                  | \$ 57.286,33              |
| 1-mar.-21                                   | 31-mar.-21   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-abr.-21                                   | 30-abr.-21   | 30          | \$ 8.571.391,81 | 8,94%                  | \$ 61.378,21              |
| 1-may.-21                                   | 31-may.-21   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-jun.-21                                   | 30-jun.-21   | 30          | \$ 8.571.391,81 | 8,94%                  | \$ 61.378,21              |
| 1-jul.-21                                   | 31-jul.-21   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-ago.-21                                   | 31-ago.-21   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-sep.-21                                   | 30-sep.-21   | 30          | \$ 8.571.391,81 | 8,94%                  | \$ 61.378,21              |
| 1-oct.-21                                   | 31-oct.-21   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-nov.-21                                   | 30-nov.-21   | 30          | \$ 8.571.391,81 | 8,94%                  | \$ 61.378,21              |
| 1-dic.-21                                   | 31-dic.-21   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-ene.-22                                   | 31-ene.-22   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-feb.-22                                   | 28-feb.-22   | 28          | \$ 8.571.391,81 | 8,94%                  | \$ 57.286,33              |
| 1-mar.-22                                   | 31-mar.-22   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-abr.-22                                   | 30-abr.-22   | 30          | \$ 8.571.391,81 | 8,94%                  | \$ 61.378,21              |
| 1-may.-22                                   | 31-may.-22   | 31          | \$ 8.571.391,81 | 8,94%                  | \$ 63.424,15              |
| 1-jun.-22                                   | 24-jun.-22   | 24          | \$ 8.571.391,81 | 8,94%                  | \$ 49.102,57              |
| <b>TOTAL</b>                                |              |             |                 | <b>\$ 1.133.450,97</b> |                           |

| <b>CUOTA CAPITAL DEL 15 DE AGOSTO DEL 2020 EN UVR´S</b> |  |             |                | <b>284,5660</b>     |  |
|---|--|-------------|----------------|---------------------|--|
| <b>VALOR UVR´S A 06 DE JUNIO DEL 2022</b>               |  |             |                | <b>306,8294</b>     |  |
| <b>CUOTA CAPITAL DEL 15 DE AGOSTO DEL 2020 EN PESOS</b> |  |             |                | <b>\$ 87.313,22</b> |  |
| <b>FECHA</b>  |  | <b>DÍAS</b> | <b>CAPITAL</b> | <b>MORA ANUAL</b>   |  |

| <i>DESDE</i> | <i>HASTA</i> |    |              |       | <i>INTERÉS<br/>MORATORIOS</i> |
|--------------|--------------|----|--------------|-------|-------------------------------|
| 16-ago.-20   | 31-ago.-20   | 16 | \$ 87.313,22 | 8,94% | \$ 333,46                     |
| 1-sep.-20    | 30-sep.-20   | 30 | \$ 87.313,22 | 8,94% | \$ 625,23                     |
| 1-oct.-20    | 31-oct.-20   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-nov.-20    | 30-nov.-20   | 30 | \$ 87.313,22 | 8,94% | \$ 625,23                     |
| 1-dic.-20    | 31-dic.-20   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-ene.-21    | 31-ene.-21   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-feb.-21    | 28-feb.-21   | 28 | \$ 87.313,22 | 8,94% | \$ 583,55                     |
| 1-mar.-21    | 31-mar.-21   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-abr.-21    | 30-abr.-21   | 30 | \$ 87.313,22 | 8,94% | \$ 625,23                     |
| 1-may.-21    | 31-may.-21   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-jun.-21    | 30-jun.-21   | 30 | \$ 87.313,22 | 8,94% | \$ 625,23                     |
| 1-jul.-21    | 31-jul.-21   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-ago.-21    | 31-ago.-21   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-sep.-21    | 30-sep.-21   | 30 | \$ 87.313,22 | 8,94% | \$ 625,23                     |
| 1-oct.-21    | 31-oct.-21   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-nov.-21    | 30-nov.-21   | 30 | \$ 87.313,22 | 8,94% | \$ 625,23                     |
| 1-dic.-21    | 31-dic.-21   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-ene.-22    | 31-ene.-22   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-feb.-22    | 28-feb.-22   | 28 | \$ 87.313,22 | 8,94% | \$ 583,55                     |
| 1-mar.-22    | 31-mar.-22   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-abr.-22    | 30-abr.-22   | 30 | \$ 87.313,22 | 8,94% | \$ 625,23                     |
| 1-may.-22    | 31-may.-22   | 31 | \$ 87.313,22 | 8,94% | \$ 646,08                     |
| 1-jun.-22    | 24-jun.-22   | 24 | \$ 87.313,22 | 8,94% | \$ 500,19                     |
| <b>TOTAL</b> |              |    |              |       | <b>\$ 14.130,30</b>           |

| <b>CUOTA CAPITAL DEL 15 DE SEPTIEMBRE DEL 2020<br/>EN UVR'S</b> |              |             |                | <b>1.024,6502</b>    |                               |
|---|--------------|-------------|----------------|----------------------|-------------------------------|
| <b>VALOR UVR'S A 06 DE JUNIO DEL 2022</b>                       |              |             |                | <b>306,8294</b>      |                               |
| <b>CUOTA CAPITAL DEL 15 DE SEPTIEMBRE DEL 2020<br/>EN PESOS</b> |              |             |                | <b>\$ 314.392,81</b> |                               |
| <i>FECHA</i>  |              | <i>DÍAS</i> | <i>CAPITAL</i> | <i>MORA ANUAL</i>    | <i>INTERÉS<br/>MORATORIOS</i> |
| <i>DESDE</i>  | <i>HASTA</i> |             |                |                      |                               |
| 16-sep.-20  | 30-sep.-20   | 15          | \$ 314.392,81  | 8,94%                | \$ 1.125,66                   |
| 1-oct.-20   | 31-oct.-20   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-nov.-20   | 30-nov.-20   | 30          | \$ 314.392,81  | 8,94%                | \$ 2.251,31                   |
| 1-dic.-20   | 31-dic.-20   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-ene.-21   | 31-ene.-21   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-feb.-21   | 28-feb.-21   | 28          | \$ 314.392,81  | 8,94%                | \$ 2.101,22                   |
| 1-mar.-21   | 31-mar.-21   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-abr.-21   | 30-abr.-21   | 30          | \$ 314.392,81  | 8,94%                | \$ 2.251,31                   |
| 1-may.-21   | 31-may.-21   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-jun.-21   | 30-jun.-21   | 30          | \$ 314.392,81  | 8,94%                | \$ 2.251,31                   |
| 1-jul.-21   | 31-jul.-21   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-ago.-21   | 31-ago.-21   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-sep.-21   | 30-sep.-21   | 30          | \$ 314.392,81  | 8,94%                | \$ 2.251,31                   |
| 1-oct.-21   | 31-oct.-21   | 31          | \$ 314.392,81  | 8,94%                | \$ 2.326,35                   |
| 1-nov.-21   | 30-nov.-21   | 30          | \$ 314.392,81  | 8,94%                | \$ 2.251,31                   |

|              |            |    |               |       |                     |
|--------------|------------|----|---------------|-------|---------------------|
| 1-dic.-21    | 31-dic.-21 | 31 | \$ 314.392,81 | 8,94% | \$ 2.326,35         |
| 1-ene.-22    | 31-ene.-22 | 31 | \$ 314.392,81 | 8,94% | \$ 2.326,35         |
| 1-feb.-22    | 28-feb.-22 | 28 | \$ 314.392,81 | 8,94% | \$ 2.101,22         |
| 1-mar.-22    | 31-mar.-22 | 31 | \$ 314.392,81 | 8,94% | \$ 2.326,35         |
| 1-abr.-22    | 30-abr.-22 | 30 | \$ 314.392,81 | 8,94% | \$ 2.251,31         |
| 1-may.-22    | 31-may.-22 | 31 | \$ 314.392,81 | 8,94% | \$ 2.326,35         |
| 1-jun.-22    | 24-jun.-22 | 24 | \$ 314.392,81 | 8,94% | \$ 1.801,05         |
| <b>TOTAL</b> |            |    |               |       | <b>\$ 48.553,27</b> |

| <b>CUOTA CAPITAL DEL 15 DE OCTUBRE DEL 2020 EN UVR'S</b> |              |             |                |                   | <b>1.024,2015</b>         |
|--|--------------|-------------|----------------|-------------------|---------------------------|
| <b>VALOR UVR'S A 06 DE JUNIO DEL 2022</b>                |              |             |                |                   | <b>306,8294</b>           |
| <b>CUOTA CAPITAL DEL 15 DE OCTUBRE DEL 2020 EN PESOS</b> |              |             |                |                   | <b>\$ 314.255,13</b>      |
| <i>FECHA</i>   |              | <i>DÍAS</i> | <i>CAPITAL</i> | <i>MORA ANUAL</i> | <i>INTERÉS MORATORIOS</i> |
| <i>DESDE</i>   | <i>HASTA</i> |             |                |                   |                           |
| 16-oct.-20   | 31-oct.-20   | 16          | \$ 314.255,13  | 8,94%             | \$ 1.200,17               |
| 1-nov.-20  | 30-nov.-20   | 30          | \$ 314.255,13  | 8,94%             | \$ 2.250,33               |
| 1-dic.-20  | 31-dic.-20   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-ene.-21  | 31-ene.-21   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-feb.-21  | 28-feb.-21   | 28          | \$ 314.255,13  | 8,94%             | \$ 2.100,30               |
| 1-mar.-21  | 31-mar.-21   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-abr.-21  | 30-abr.-21   | 30          | \$ 314.255,13  | 8,94%             | \$ 2.250,33               |
| 1-may.-21  | 31-may.-21   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-jun.-21  | 30-jun.-21   | 30          | \$ 314.255,13  | 8,94%             | \$ 2.250,33               |
| 1-jul.-21  | 31-jul.-21   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-ago.-21  | 31-ago.-21   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-sep.-21  | 30-sep.-21   | 30          | \$ 314.255,13  | 8,94%             | \$ 2.250,33               |
| 1-oct.-21  | 31-oct.-21   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-nov.-21  | 30-nov.-21   | 30          | \$ 314.255,13  | 8,94%             | \$ 2.250,33               |
| 1-dic.-21  | 31-dic.-21   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-ene.-22  | 31-ene.-22   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-feb.-22  | 28-feb.-22   | 28          | \$ 314.255,13  | 8,94%             | \$ 2.100,30               |
| 1-mar.-22  | 31-mar.-22   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-abr.-22  | 30-abr.-22   | 30          | \$ 314.255,13  | 8,94%             | \$ 2.250,33               |
| 1-may.-22  | 31-may.-22   | 31          | \$ 314.255,13  | 8,94%             | \$ 2.325,34               |
| 1-jun.-22  | 24-jun.-22   | 24          | \$ 314.255,13  | 8,94%             | \$ 1.800,26               |
| <b>TOTAL</b>   |              |             |                |                   | <b>\$ 46.281,69</b>       |

| <b>CUOTA CAPITAL DEL 15 DE NOVIEMBRE DEL 2020 EN UVR'S</b> |              |             |                |                   | <b>1.023,7725</b>         |
|--|--------------|-------------|----------------|-------------------|---------------------------|
| <b>VALOR UVR'S A 06 DE JUNIO DEL 2022</b>                  |              |             |                |                   | <b>306,8294</b>           |
| <b>CUOTA CAPITAL DEL 15 DE NOVIEMBRE DEL 2020 EN PESOS</b> |              |             |                |                   | <b>\$ 314.123,50</b>      |
| <i>FECHA</i>   |              | <i>DÍAS</i> | <i>CAPITAL</i> | <i>MORA ANUAL</i> | <i>INTERÉS MORATORIOS</i> |
| <i>DESDE</i>   | <i>HASTA</i> |             |                |                   |                           |
| 16-nov.-20   | 30-nov.-20   | 15          | \$ 314.123,50  | 8,94%             | \$ 1.124,69               |
| 1-dic.-20  | 31-dic.-20   | 31          | \$ 314.123,50  | 8,94%             | \$ 2.324,36               |
| 1-ene.-21  | 31-ene.-21   | 31          | \$ 314.123,50  | 8,94%             | \$ 2.324,36               |

|              |            |    |               |       |                     |
|--------------|------------|----|---------------|-------|---------------------|
| 1-feb.-21    | 28-feb.-21 | 28 | \$ 314.123,50 | 8,94% | \$ 2.099,42         |
| 1-mar.-21    | 31-mar.-21 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-abr.-21    | 30-abr.-21 | 30 | \$ 314.123,50 | 8,94% | \$ 2.249,38         |
| 1-may.-21    | 31-may.-21 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-jun.-21    | 30-jun.-21 | 30 | \$ 314.123,50 | 8,94% | \$ 2.249,38         |
| 1-jul.-21    | 31-jul.-21 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-ago.-21    | 31-ago.-21 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-sep.-21    | 30-sep.-21 | 30 | \$ 314.123,50 | 8,94% | \$ 2.249,38         |
| 1-oct.-21    | 31-oct.-21 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-nov.-21    | 30-nov.-21 | 30 | \$ 314.123,50 | 8,94% | \$ 2.249,38         |
| 1-dic.-21    | 31-dic.-21 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-ene.-22    | 31-ene.-22 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-feb.-22    | 28-feb.-22 | 28 | \$ 314.123,50 | 8,94% | \$ 2.099,42         |
| 1-mar.-22    | 31-mar.-22 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-abr.-22    | 30-abr.-22 | 30 | \$ 314.123,50 | 8,94% | \$ 2.249,38         |
| 1-may.-22    | 31-may.-22 | 31 | \$ 314.123,50 | 8,94% | \$ 2.324,36         |
| 1-jun.-22    | 24-jun.-22 | 24 | \$ 314.123,50 | 8,94% | \$ 1.799,51         |
| <b>TOTAL</b> |            |    |               |       | <b>\$ 43.937,94</b> |

|  |                         |
|--|-------------------------|
| <b>CAPITAL ACELERADO</b>               | <b>\$ 8.571.398,81</b>  |
| <b>INTERES DE MORA</b>                 | <b>\$ 1.133.450,97</b>  |
| <b>CAPITAL DE CUOTAS EN MORA</b>       | <b>\$ 1.030.084,65</b>  |
| <b>INTERES DE MORA</b>                 | <b>\$ 152.903,19</b>    |
| <b>INTERES DE PLAZO</b>                | <b>\$ 258.679,22</b>    |
| <b>TOTAL LIQUIDACIÓN AL 28/06/2022</b> | <b>\$ 11.146.516,85</b> |

Sírvase señor Juez proceder de conformidad,



**JOSE IVAN SUAREZ ESCAMILLA**  
**C.C. 91.012.860 de Barbosa Santander**  
**T.P. 74502 del C.S.J.**  
[joseivan.suarez@gesticobranzas.com](mailto:joseivan.suarez@gesticobranzas.com)  
1607 – FBD

LIQUIDACION DE CREDITO / RAD: 2020-529 FONDO NACIONAL DEL AHORRO VS WALTER ANDRES CARDENAS MENDOZA

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Mié 29/06/2022 9:35

Para:

- Juzgado 03 Civil Municipal - Cundinamarca - Fusagasuga <j03cmpalfusa@cendoj.ramajudicial.gov.co>

CC:

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Señor

JUEZ 3 CIVIL MUNICIPAL DE FUSAGASUGA

RAD: 2020-529

DEMANDANTE: FONDO NACIONAL DEL AHORRO

DEMANDADO: WALTER ANDRES CARDENAS

Respetado señor juez:

JOSE IVAN SUAREZ ESCAMILLA, mayor de edad, residente y domiciliado en la ciudad de Bogotá D.C. identificado como aparece al pie de mi firma, obrando en mi condición de apoderado judicial de la parte Actora, dentro del proceso de la referencia, comedidamente, me permito allegar memorial del asunto, con el fin de que quede radicado ante el despacho y se realice el trámite correspondiente.

Agradezco la atención prestada y solicito por favor acuse de recibido del presente

Cordialmente,

JOSE IVAN SUAREZ ESCAMILLA

C. C. No. 91.012.860 de Barbosa Santander

T. P. No. 74502 del C. S. J.

CORREO: [joseivan.suarez@gesticobranzas.com](mailto:joseivan.suarez@gesticobranzas.com)

APODERADO PARTE DEMANDANTE

CALLE 35 # 7 – 25 OFICINA 401