

**MEMORIAL DENTRO DEL PROCESO EJECUTIVO DE CHEVYPLAN S.A CONTRA JASMIN LUCERO GONZALEZ NIÑO Y OTRO rad 2017-00789-00**

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Jue 24/06/2021 11:24

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

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SEÑORES

JUZGADO TERCERO CIVIL MUNICIPAL DE FUSAGASUGA CUNDINAMARCA

Actuando como apoderado de la parte actora, me permito adjuntar en formato pdf memorial para el proceso citado en el asunto del presente mensaje.

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ANTONIO NUÑEZ ORTIZ

T.P. 33.585 del C.S.J.

C.C. 5.902.254 del Espinal Tolima

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*Recibido # 1  
11. 3*



SEÑORES

JUZGADO TERCERO CIVIL MUNICIPAL DE FUSAGASUGA CUNDINAMARCA.  
SU DESPACHO

REFERENCIA: EJECUTIVO  
DEMANDANTE: CHEVYPLAN S.A  
DEMANDADO: JASMIN LUCERO GONZALEZ NIÑO Y OTRO  
RADICACIÓN: 2017-00789-00

Actuando como apoderado de la parte demandante, a continuación me permito detallar la liquidación del crédito actualizada al 23 de Junio de 2021, conforme a lo establecido por el Artículo 446 del Código General del Proceso.

CAPITAL 1

Capital	Desde	Hasta	Días	Tasa anual	Tasa mensual	Tasa de mora	Vr. días en mora	Abonos	Saldo	
									Intereses	Capital
\$ 48.592.687	5-dic	31-dic-17	27	29,16%	2,16%	3,233%	\$ 1.413.843,47	\$ 0	\$ 1.413.843	\$ 48.592.687
\$ 48.592.687	1-ene	31-ene-18	31	29,04%	2,15%	3,221%	\$ 1.617.342,11	\$ 1.915.286	\$ 1.115.900	\$ 48.592.687
\$ 48.592.687	1-feb	28-feb-18	28	31,52%	2,31%	3,464%	\$ 1.571.150,74	\$ 0	\$ 2.687.050	\$ 48.592.687
\$ 48.592.687	1-mar	31-mar-18	31	31,02%	2,28%	3,416%	\$ 1.715.032,99	\$ 0	\$ 4.402.083	\$ 48.592.687
\$ 48.592.687	1-abr	30-abr-18	30	30,72%	2,26%	3,386%	\$ 1.645.469,71	\$ 4.137.811	\$ 1.909.742	\$ 48.592.687
\$ 48.592.687	1-may	31-may-18	31	30,66%	2,25%	3,380%	\$ 1.697.372,12	\$ 736.737	\$ 2.870.377	\$ 48.592.687
\$ 48.592.687	1-jun	30-jun-18	30	30,42%	2,24%	3,357%	\$ 1.631.200,08	\$ 0	\$ 4.501.577	\$ 48.592.687
\$ 48.592.687	1-jul	31-jul-18	31	30,05%	2,21%	3,321%	\$ 1.667.344,69	\$ 3.489.675	\$ 2.679.247	\$ 48.592.687
\$ 48.592.687	1-ago	31-ago-18	31	29,91%	2,20%	3,307%	\$ 1.660.434,94	\$ 850.286	\$ 3.489.396	\$ 48.592.687
\$ 48.592.687	1-sep	30-sep-18	30	29,72%	2,19%	3,288%	\$ 1.597.786,92	\$ 0	\$ 5.087.183	\$ 48.592.687
\$ 48.592.687	1-oct	31-oct-18	31	29,45%	2,17%	3,262%	\$ 1.637.683,30	\$ 1.666.272	\$ 5.058.594	\$ 48.592.687
\$ 48.592.687	1-nov	30-nov-18	30	29,24%	2,16%	3,241%	\$ 1.574.779,39	\$ 0	\$ 6.633.373	\$ 48.592.687
\$ 48.592.687	1-dic	31-dic-18	31	29,10%	2,15%	3,227%	\$ 1.620.322,57	\$ 657.889	\$ 7.595.807	\$ 48.592.687
\$ 48.592.687	1-ene	31-ene-19	31	28,74%	2,13%	3,191%	\$ 1.602.420,75	\$ 1.076.983	\$ 8.121.245	\$ 48.592.687
\$ 48.592.687	1-feb	28-feb-19	28	29,55%	2,18%	3,271%	\$ 1.483.670,87	\$ 0	\$ 9.604.916	\$ 48.592.687
\$ 48.592.687	1-mar	31-mar-19	31	29,06%	2,15%	3,223%	\$ 1.618.335,74	\$ 0	\$ 11.223.251	\$ 48.592.687
\$ 48.592.687	1-abr	30-abr-19	30	28,98%	2,14%	3,215%	\$ 1.562.284,24	\$ 0	\$ 12.785.536	\$ 48.592.687
\$ 48.592.687	1-may	31-may-19	31	29,01%	2,15%	3,218%	\$ 1.615.851,41	\$ 0	\$ 14.401.387	\$ 48.592.687
\$ 48.592.687	1-jun	30-jun-19	30	28,95%	2,14%	3,212%	\$ 1.560.841,01	\$ 260.181	\$ 15.702.047	\$ 48.592.687
\$ 48.592.687	1-jul	31-jul-19	31	28,92%	2,14%	3,209%	\$ 1.611.377,39	\$ 0	\$ 17.313.424	\$ 48.592.687
\$ 48.592.687	1-ago	31-ago-19	31	28,98%	2,14%	3,215%	\$ 1.614.360,39	\$ 0	\$ 18.927.785	\$ 48.592.687
\$ 48.592.687	1-sep	30-sep-19	30	28,98%	2,14%	3,215%	\$ 1.562.284,24	\$ 0	\$ 20.490.069	\$ 48.592.687
\$ 48.592.687	1-oct	31-oct-19	31	28,65%	2,12%	3,182%	\$ 1.597.938,13	\$ 0	\$ 22.088.007	\$ 48.592.687
\$ 48.592.687	1-nov	30-nov-19	30	28,55%	2,11%	3,172%	\$ 1.541.568,44	\$ 0	\$ 23.629.576	\$ 48.592.687
\$ 48.592.687	1-dic	31-dic-19	31	28,37%	2,10%	3,155%	\$ 1.583.973,78	\$ 0	\$ 25.213.549	\$ 48.592.687
\$ 48.592.687	1-ene	31-ene-20	31	28,16%	2,09%	3,134%	\$ 1.573.482,18	\$ 0	\$ 26.787.032	\$ 48.592.687
\$ 48.592.687	1-feb	29-feb-20	29	28,59%	2,12%	3,176%	\$ 1.492.048,23	\$ 0	\$ 28.279.080	\$ 48.592.687
\$ 48.592.687	1-mar	31-mar-20	31	28,43%	2,11%	3,161%	\$ 1.586.968,49	\$ 0	\$ 29.866.048	\$ 48.592.687
\$ 48.592.687	1-abr	30-abr-20	30	28,04%	2,08%	3,122%	\$ 1.516.916,04	\$ 0	\$ 31.382.964	\$ 48.592.687
\$ 48.592.687	1-may	31-may-20	31	27,29%	2,03%	3,047%	\$ 1.529.848,43	\$ 0	\$ 32.912.813	\$ 48.592.687
\$ 48.592.687	1-jun	30-jun-20	30	27,18%	2,02%	3,036%	\$ 1.475.140,71	\$ 0	\$ 34.387.953	\$ 48.592.687
\$ 48.592.687	1-jul	31-jul-20	31	27,18%	2,02%	3,036%	\$ 1.524.312,07	\$ 0	\$ 35.912.266	\$ 48.592.687
\$ 48.592.687	1-ago	31-ago-20	31	27,44%	2,04%	3,062%	\$ 1.537.390,96	\$ 0	\$ 37.449.657	\$ 48.592.687
\$ 48.592.687	1-sep	30-sep-20	30	27,53%	2,05%	3,071%	\$ 1.492.173,45	\$ 0	\$ 38.941.830	\$ 48.592.687
\$ 48.592.687	1-oct	31-oct-20	31	27,14%	2,02%	3,032%	\$ 1.522.297,76	\$ 0	\$ 40.464.128	\$ 48.592.687
\$ 48.592.687	1-nov	30-nov-20	30	26,76%	2,00%	2,994%	\$ 1.454.644,61	\$ 0	\$ 41.918.772	\$ 48.592.687
\$ 48.592.687	1-dic	31-dic-20	31	26,19%	1,96%	2,936%	\$ 1.474.286,30	\$ 3.468.682	\$ 39.924.377	\$ 48.592.687
\$ 48.592.687	1-ene	31-ene-21	31	25,98%	1,94%	2,915%	\$ 1.463.628,54	\$ 850.286	\$ 40.537.719	\$ 48.592.687
\$ 48.592.687	1-feb	28-feb-21	28	26,31%	1,97%	2,948%	\$ 1.337.107,62	\$ 1.700.572	\$ 40.174.255	\$ 48.592.687
\$ 48.592.687	1-mar	31-mar-21	31	26,12%	1,95%	2,929%	\$ 1.470.735,52	\$ 0	\$ 41.644.990	\$ 48.592.687
\$ 48.592.687	1-abr	30-abr-21	30	25,97%	1,94%	2,914%	\$ 1.415.923,18	\$ 850.286	\$ 42.210.628	\$ 48.592.687
\$ 48.592.687	1-may	31-may-21	31	25,83%	1,93%	2,900%	\$ 1.456.005,88	\$ 850.286	\$ 42.816.347	\$ 48.592.687
\$ 48.592.687	1-jun	23-jun-21	23	25,82%	1,93%	2,899%	\$ 1.079.885,17	\$ 0	\$ 43.896.233	\$ 48.592.687



\$ 1.160.574	5-dic	31-dic-17	27	29,16%	2,16%	3,233%	\$ 33.767,84	\$ 0	\$ 33.768	\$ 1.160.574
\$ 1.160.574	1-ene	31-ene-18	31	29,04%	2,15%	3,221%	\$ 38.628,14	\$ 0	\$ 72.396	\$ 1.160.574
\$ 1.160.574	1-feb	28-feb-18	28	31,52%	2,31%	3,464%	\$ 37.524,92	\$ 0	\$ 109.921	\$ 1.160.574
\$ 1.160.574	1-mar	31-mar-18	31	31,02%	2,28%	3,416%	\$ 40.961,36	\$ 0	\$ 150.882	\$ 1.160.574
\$ 1.160.574	1-abr	30-abr-18	30	30,72%	2,26%	3,386%	\$ 39.299,93	\$ 0	\$ 190.182	\$ 1.160.574
\$ 1.160.574	1-may	31-may-18	31	30,66%	2,25%	3,380%	\$ 40.539,56	\$ 0	\$ 230.722	\$ 1.160.574
\$ 1.160.574	1-jun	30-jun-18	30	30,42%	2,24%	3,357%	\$ 38.959,12	\$ 0	\$ 269.681	\$ 1.160.574
\$ 1.160.574	1-jul	31-jul-18	31	30,05%	2,21%	3,321%	\$ 39.822,39	\$ 0	\$ 309.503	\$ 1.160.574
\$ 1.160.574	1-ago	31-ago-18	31	29,91%	2,20%	3,307%	\$ 39.657,36	\$ 0	\$ 349.161	\$ 1.160.574
\$ 1.160.574	1-sep	30-sep-18	30	29,72%	2,19%	3,288%	\$ 38.161,09	\$ 0	\$ 387.322	\$ 1.160.574
\$ 1.160.574	1-oct	31-oct-18	31	29,45%	2,17%	3,262%	\$ 39.113,96	\$ 0	\$ 426.436	\$ 1.160.574
\$ 1.160.574	1-nov	30-nov-18	30	29,24%	2,16%	3,241%	\$ 37.611,59	\$ 0	\$ 464.047	\$ 1.160.574
\$ 1.160.574	1-dic	31-dic-18	31	29,10%	2,15%	3,227%	\$ 38.699,33	\$ 0	\$ 502.747	\$ 1.160.574
\$ 1.160.574	1-ene	31-ene-19	31	28,74%	2,13%	3,191%	\$ 38.271,76	\$ 0	\$ 541.018	\$ 1.160.574
\$ 1.160.574	1-feb	28-feb-19	28	29,55%	2,18%	3,271%	\$ 35.435,58	\$ 0	\$ 576.454	\$ 1.160.574
\$ 1.160.574	1-mar	31-mar-19	31	29,06%	2,15%	3,223%	\$ 38.651,87	\$ 0	\$ 615.106	\$ 1.160.574
\$ 1.160.574	1-abr	30-abr-19	30	28,98%	2,14%	3,215%	\$ 37.313,16	\$ 0	\$ 652.419	\$ 1.160.574
\$ 1.160.574	1-may	31-may-19	31	29,01%	2,15%	3,218%	\$ 38.592,54	\$ 0	\$ 691.011	\$ 1.160.574
\$ 1.160.574	1-jun	30-jun-19	30	28,95%	2,14%	3,212%	\$ 37.278,69	\$ 0	\$ 728.290	\$ 1.160.574
\$ 1.160.574	1-jul	31-jul-19	31	28,92%	2,14%	3,209%	\$ 38.485,68	\$ 0	\$ 766.776	\$ 1.160.574
\$ 1.160.574	1-ago	31-ago-19	31	28,98%	2,14%	3,215%	\$ 38.556,93	\$ 0	\$ 805.333	\$ 1.160.574
\$ 1.160.574	1-sep	30-sep-19	30	28,98%	2,14%	3,215%	\$ 37.313,16	\$ 0	\$ 842.646	\$ 1.160.574
\$ 1.160.574	1-oct	31-oct-19	31	28,65%	2,12%	3,182%	\$ 38.164,70	\$ 0	\$ 880.811	\$ 1.160.574
\$ 1.160.574	1-nov	30-nov-19	30	28,55%	2,11%	3,172%	\$ 36.818,38	\$ 0	\$ 917.629	\$ 1.160.574
\$ 1.160.574	1-dic	31-dic-19	31	28,37%	2,10%	3,155%	\$ 37.831,18	\$ 0	\$ 955.460	\$ 1.160.574
\$ 1.160.574	1-ene	31-ene-20	31	28,16%	2,09%	3,134%	\$ 37.580,60	\$ 0	\$ 993.041	\$ 1.160.574
\$ 1.160.574	1-feb	29-feb-20	29	28,59%	2,12%	3,176%	\$ 35.635,66	\$ 0	\$ 1.028.676	\$ 1.160.574
\$ 1.160.574	1-mar	31-mar-20	31	28,43%	2,11%	3,161%	\$ 37.902,71	\$ 0	\$ 1.066.579	\$ 1.160.574
\$ 1.160.574	1-abr	30-abr-20	30	28,04%	2,08%	3,122%	\$ 36.229,59	\$ 0	\$ 1.102.809	\$ 1.160.574
\$ 1.160.574	1-may	31-may-20	31	27,29%	2,03%	3,047%	\$ 36.538,47	\$ 0	\$ 1.139.347	\$ 1.160.574
\$ 1.160.574	1-jun	30-jun-20	30	27,18%	2,02%	3,036%	\$ 35.231,84	\$ 0	\$ 1.174.579	\$ 1.160.574
\$ 1.160.574	1-jul	31-jul-20	31	27,18%	2,02%	3,036%	\$ 36.406,24	\$ 0	\$ 1.210.985	\$ 1.160.574
\$ 1.160.574	1-ago	31-ago-20	31	27,44%	2,04%	3,062%	\$ 36.718,61	\$ 0	\$ 1.247.704	\$ 1.160.574
\$ 1.160.574	1-sep	30-sep-20	30	27,53%	2,05%	3,071%	\$ 35.638,65	\$ 0	\$ 1.283.343	\$ 1.160.574
\$ 1.160.574	1-oct	31-oct-20	31	27,14%	2,02%	3,032%	\$ 36.358,13	\$ 0	\$ 1.319.701	\$ 1.160.574
\$ 1.160.574	1-nov	30-nov-20	30	26,76%	2,00%	2,994%	\$ 34.742,32	\$ 0	\$ 1.354.443	\$ 1.160.574
\$ 1.160.574	1-dic	31-dic-20	31	26,19%	1,96%	2,936%	\$ 35.211,44	\$ 0	\$ 1.389.654	\$ 1.160.574
\$ 1.160.574	1-ene	31-ene-21	31	25,98%	1,94%	2,915%	\$ 34.956,89	\$ 0	\$ 1.424.611	\$ 1.160.574
\$ 1.160.574	1-feb	28-feb-21	28	26,31%	1,97%	2,948%	\$ 31.935,10	\$ 0	\$ 1.456.546	\$ 1.160.574
\$ 1.160.574	1-mar	31-mar-21	31	26,12%	1,95%	2,929%	\$ 35.126,63	\$ 0	\$ 1.491.673	\$ 1.160.574
\$ 1.160.574	1-abr	30-abr-21	30	25,97%	1,94%	2,914%	\$ 33.817,51	\$ 0	\$ 1.525.491	\$ 1.160.574
\$ 1.160.574	1-may	31-may-21	31	25,83%	1,93%	2,900%	\$ 34.774,83	\$ 0	\$ 1.560.265	\$ 1.160.574
\$ 1.160.574	1-jun	23-jun-21	23	25,82%	1,93%	2,899%	\$ 25.791,67	\$ 0	\$ 1.586.057	\$ 1.160.574

RESUMEN

CAPITAL No.1	\$ 48.592.687
CAPITAL No.2	\$ 1.160.574
INTERESES MORATORIOS CAPITAL No.1 DEL 05/12/2017 HASTA 23/06/2021	\$ 43.896.233
INTERESES MORATORIOS CAPITAL No.2 DEL 05/12/2017 HASTA 23/06/2021	\$ 1.586.057
INTERESES CAUSADOS Y NO PAGADOS	\$ 153.429
ABONOS	\$22.511.232
TOTAL	\$ 72.877.748

Cordialmente.

ANTONIO NUÑEZ ORTIZ

C.C. 5.902.254 del Espinal.

T.P. 33.585 del C. S. de la J.

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TOTAL	\$ 69,791,192	\$ 432,000	\$ 49,120	\$ 44,812,173	\$ 37,012,997	\$ 6,401,329	\$ 1,197,847	\$ 1,693,202	\$ 34,043	\$ 44,942,633	\$ 159,280	\$ 12,849,441	TOTAL	\$ 61,818,725
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17/04/2016  
 4/12/2017  
 Asamblea de Adjudicación  
 Dependimiento de pago

Detalles: La cuota de inscripción está destinada a cubrir los costos inherentes en que incurre ChevyPlan, tales como comisiones, estudios de ocupación, propagandas, etc.  
 Administrador: El importe suma de dinero, determinado por la sociedad, la cual está destinada a los gastos administrativos de la misma.