

SEÑOR  
JUEZ 64 CIVIL MUNICIPAL DE BOGOTÁ D.C.  
E. S. D.

PROCESO EJECUTIVO PARA LA EFECTIVIDAD DE LA GARANTÍA REAL DE  
FONDO NACIONAL DEL AHORRO  
CONTRA JUAN CARLOS LOPEZ VARGAS

RADICACIÓN: 11001400306420170151900

ASUNTO: ALLEGO LIQUIDACIÓN DE CRÉDITO

JORGE ERNESTO DURÁN MONTAÑA, actuando en mi calidad de apoderado de la parte demandante, de manera respetuosa me permito presentar liquidación actualizada del crédito conforme a lo indicado en mandamiento de pago, y la sentencia dictada en el presente asunto, lo cual resumo así:

| SUB TOTAL CAPITAL CUOTAS VENCIDAS<br>PREVIO A PRESENTACIÓN DEMANDA | EN PESOS      | INTERESES PLAZO SOBRE<br>CUOTAS VENCIDAS<br>PREVIO A DEMANDA | INTERESES<br>MORATORIOS SOBRE<br>CUOTAS VENCIDAS |
|--------------------------------------------------------------------|---------------|--------------------------------------------------------------|--------------------------------------------------|
|                                                                    | \$ 998.538,00 | \$ 2.905.240,00                                              | \$ 16.220,21                                     |

| SUB TOTAL CAPITAL ACELERADO | EN PESOS         |
|-----------------------------|------------------|
|                             | \$ 25.627.829,00 |

| TOTAL CAPITAL ADEUDADO | EN PESOS         |
|------------------------|------------------|
|                        | \$ 26.626.367,00 |

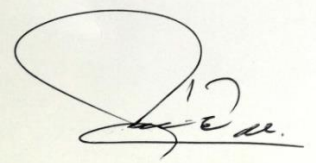
| TOTAL INTERESES CORRIENTES MAS<br>MORATORIOS | EN PESOS         |
|----------------------------------------------|------------------|
|                                              | \$ 31.209.312,51 |

| TOTAL LIQUIDACIÓN ACTUALIZADA | \$ 57.835.679,51 |
|-------------------------------|------------------|
|-------------------------------|------------------|

Conforme a lo anterior solicito al despacho se sirva correr traslado a la liquidación de crédito allegada.

De antemano agradezco su atención.

Cordial saludo



JORGE ERNESTO DURÁN MONTAÑA  
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Dirección Física: Carrera. 3 No. 18-32 Bogotá D.C.

# LIQUIDACIÓN INTERESES CORRIENTE + MORA LEGAL

JUAN CARLOS LOPEZ VARGAS

|                                                                 |                              |            |            | TASA MORA | 19,20%                 |                                        |                                  |
|-----------------------------------------------------------------|------------------------------|------------|------------|-----------|------------------------|----------------------------------------|----------------------------------|
|                                                                 |                              |            | VIGENCIA   |           |                        |                                        |                                  |
| CUOTA ADEUDADA                                                  | VALOR CUOTA CAPITAL EN PESOS | DESDE      | HASTA      | No. DIAS  | TASA INTERES MORATORIO | VALOR INTERESES MORATORIOS DEL PERIODO | VALOR FINAL INTERESES MORATORIOS |
| 40                                                              | \$ 86.290                    | 17/10/2016 | 16/11/2016 | 31        | 19,20%                 | \$ 1.426,66                            | \$ 1.426,66                      |
| 41                                                              | \$ 87.160                    | 17/11/2016 | 16/12/2016 | 30        | 19,20%                 | \$ 1.394,56                            | \$ 2.821,22                      |
| 42                                                              | \$ 88.039                    | 17/12/2016 | 16/01/2017 | 31        | 19,20%                 | \$ 1.455,58                            | \$ 4.276,80                      |
| 43                                                              | \$ 88.927                    | 17/01/2017 | 16/02/2017 | 31        | 19,20%                 | \$ 1.470,26                            | \$ 5.747,06                      |
| 44                                                              | \$ 89.824                    | 17/02/2017 | 16/03/2017 | 28        | 19,20%                 | \$ 1.341,37                            | \$ 7.088,43                      |
| 45                                                              | \$ 90.731                    | 17/03/2017 | 16/04/2017 | 31        | 19,20%                 | \$ 1.500,09                            | \$ 8.588,52                      |
| 46                                                              | \$ 91.646                    | 17/04/2017 | 16/05/2017 | 30        | 19,20%                 | \$ 1.466,34                            | \$ 10.054,85                     |
| 47                                                              | \$ 92.570                    | 17/05/2017 | 16/06/2017 | 31        | 19,20%                 | \$ 1.530,49                            | \$ 11.585,34                     |
| 48                                                              | \$ 93.504                    | 17/06/2017 | 16/07/2017 | 30        | 19,20%                 | \$ 1.496,06                            | \$ 13.081,41                     |
| 49                                                              | \$ 94.447                    | 17/07/2017 | 16/08/2017 | 31        | 19,20%                 | \$ 1.561,52                            | \$ 14.642,93                     |
| 50                                                              | \$ 95.400                    | 17/08/2017 | 16/09/2017 | 31        | 19,20%                 | \$ 1.577,28                            | \$ 16.220,21                     |
| CAPITAL ACELERADO + CAPITAL VENCIDO<br>\$25.627.829 + \$998.538 | \$ 26.626.367                | 17/09/2017 | 16/10/2017 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 442.242,08                    |
|                                                                 | \$ 26.626.367                | 17/10/2017 | 16/11/2017 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 882.464,68                    |
|                                                                 | \$ 26.626.367                | 17/11/2017 | 16/12/2017 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 1.308.486,56                  |
|                                                                 | \$ 26.626.367                | 17/12/2017 | 16/01/2018 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 1.748.709,16                  |
|                                                                 | \$ 26.626.367                | 17/01/2018 | 16/02/2018 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 2.188.931,76                  |
|                                                                 | \$ 26.626.367                | 17/02/2018 | 16/03/2018 | 28        | 19,20%                 | \$ 397.620,41                          | \$ 2.586.552,17                  |
|                                                                 | \$ 26.626.367                | 17/03/2018 | 16/04/2018 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 3.026.774,77                  |
|                                                                 | \$ 26.626.367                | 17/04/2018 | 16/05/2018 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 3.452.796,65                  |
|                                                                 | \$ 26.626.367                | 17/05/2018 | 16/06/2018 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 3.893.019,25                  |
|                                                                 | \$ 26.626.367                | 17/06/2018 | 16/07/2018 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 4.319.041,12                  |
|                                                                 | \$ 26.626.367                | 17/07/2018 | 16/08/2018 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 4.759.263,72                  |
|                                                                 | \$ 26.626.367                | 17/08/2018 | 16/09/2018 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 5.199.486,32                  |
|                                                                 | \$ 26.626.367                | 17/09/2018 | 16/10/2018 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 5.625.508,19                  |
|                                                                 | \$ 26.626.367                | 17/10/2018 | 16/11/2018 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 6.065.730,79                  |
|                                                                 | \$ 26.626.367                | 17/11/2018 | 16/12/2018 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 6.491.752,67                  |
|                                                                 | \$ 26.626.367                | 17/12/2018 | 16/01/2019 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 6.931.975,27                  |
|                                                                 | \$ 26.626.367                | 17/01/2019 | 16/02/2019 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 7.372.197,87                  |
|                                                                 | \$ 26.626.367                | 17/02/2019 | 16/03/2019 | 28        | 19,20%                 | \$ 397.620,41                          | \$ 7.769.818,28                  |
|                                                                 | \$ 26.626.367                | 17/03/2019 | 16/04/2019 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 8.210.040,88                  |
|                                                                 | \$ 26.626.367                | 17/04/2019 | 16/05/2019 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 8.636.062,75                  |
|                                                                 | \$ 26.626.367                | 17/05/2019 | 16/06/2019 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 9.076.285,36                  |
|                                                                 | \$ 26.626.367                | 17/06/2019 | 16/07/2019 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 9.502.307,23                  |
|                                                                 | \$ 26.626.367                | 17/07/2019 | 16/08/2019 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 9.942.529,83                  |
|                                                                 | \$ 26.626.367                | 17/08/2019 | 16/09/2019 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 10.382.752,43                 |
|                                                                 | \$ 26.626.367                | 17/09/2019 | 16/10/2019 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 10.808.774,30                 |
|                                                                 | \$ 26.626.367                | 17/10/2019 | 16/11/2019 | 31        | 19,20%                 | \$ 440.222,60                          | \$ 11.248.996,90                 |
|                                                                 | \$ 26.626.367                | 17/11/2019 | 16/12/2019 | 30        | 19,20%                 | \$ 426.021,87                          | \$ 11.675.018,77                 |

|                                                                  |               |            |            |    |        |               |                  |
|------------------------------------------------------------------|---------------|------------|------------|----|--------|---------------|------------------|
| CAPITAL ACCELERADO + CAPITAL VENCIDO<br>\$25.627.829 + \$998.538 | \$ 26.626.367 | 17/12/2019 | 16/01/2020 | 31 | 19,20% | \$ 440.222,60 | \$ 12.115.241,38 |
|                                                                  | \$ 26.626.367 | 17/01/2020 | 16/02/2020 | 31 | 19,20% | \$ 440.222,60 | \$ 12.555.463,98 |
|                                                                  | \$ 26.626.367 | 17/02/2020 | 16/03/2020 | 29 | 19,20% | \$ 411.821,14 | \$ 12.967.285,12 |
|                                                                  | \$ 26.626.367 | 17/03/2020 | 16/04/2020 | 31 | 19,20% | \$ 440.222,60 | \$ 13.407.507,72 |
|                                                                  | \$ 26.626.367 | 17/04/2020 | 16/05/2020 | 30 | 19,20% | \$ 426.021,87 | \$ 13.833.529,59 |
|                                                                  | \$ 26.626.367 | 17/05/2020 | 16/06/2020 | 31 | 19,20% | \$ 440.222,60 | \$ 14.273.752,19 |
|                                                                  | \$ 26.626.367 | 17/06/2020 | 16/07/2020 | 30 | 19,20% | \$ 426.021,87 | \$ 14.699.774,07 |
|                                                                  | \$ 26.626.367 | 17/07/2020 | 16/08/2020 | 31 | 19,20% | \$ 440.222,60 | \$ 15.139.996,67 |
|                                                                  | \$ 26.626.367 | 17/08/2020 | 16/09/2020 | 31 | 19,20% | \$ 440.222,60 | \$ 15.580.219,27 |
|                                                                  | \$ 26.626.367 | 17/09/2020 | 16/10/2020 | 30 | 19,20% | \$ 426.021,87 | \$ 16.006.241,14 |
|                                                                  | \$ 26.626.367 | 17/10/2020 | 16/11/2020 | 31 | 19,20% | \$ 440.222,60 | \$ 16.446.463,74 |
|                                                                  | \$ 26.626.367 | 17/11/2020 | 16/12/2020 | 30 | 19,20% | \$ 426.021,87 | \$ 16.872.485,61 |
|                                                                  | \$ 26.626.367 | 17/12/2020 | 16/01/2021 | 31 | 19,20% | \$ 440.222,60 | \$ 17.312.708,21 |
|                                                                  | \$ 26.626.367 | 17/01/2021 | 16/02/2021 | 31 | 19,20% | \$ 440.222,60 | \$ 17.752.930,82 |
|                                                                  | \$ 26.626.367 | 17/02/2021 | 16/03/2021 | 28 | 19,20% | \$ 397.620,41 | \$ 18.150.551,23 |
|                                                                  | \$ 26.626.367 | 17/03/2021 | 16/04/2021 | 31 | 19,20% | \$ 440.222,60 | \$ 18.590.773,83 |
|                                                                  | \$ 26.626.367 | 17/04/2021 | 16/05/2021 | 30 | 19,20% | \$ 426.021,87 | \$ 19.016.795,70 |
|                                                                  | \$ 26.626.367 | 17/05/2021 | 16/06/2021 | 31 | 19,20% | \$ 440.222,60 | \$ 19.457.018,30 |
|                                                                  | \$ 26.626.367 | 17/06/2021 | 16/07/2021 | 30 | 19,20% | \$ 426.021,87 | \$ 19.883.040,18 |
|                                                                  | \$ 26.626.367 | 17/07/2021 | 16/08/2021 | 31 | 19,20% | \$ 440.222,60 | \$ 20.323.262,78 |
|                                                                  | \$ 26.626.367 | 17/08/2021 | 16/09/2021 | 31 | 19,20% | \$ 440.222,60 | \$ 20.763.485,38 |
|                                                                  | \$ 26.626.367 | 17/09/2021 | 16/10/2021 | 30 | 19,20% | \$ 426.021,87 | \$ 21.189.507,25 |
|                                                                  | \$ 26.626.367 | 17/10/2021 | 16/11/2021 | 31 | 19,20% | \$ 440.222,60 | \$ 21.629.729,85 |
|                                                                  | \$ 26.626.367 | 17/11/2021 | 16/12/2021 | 30 | 19,20% | \$ 426.021,87 | \$ 22.055.751,72 |
|                                                                  | \$ 26.626.367 | 17/12/2021 | 16/01/2022 | 31 | 19,20% | \$ 440.222,60 | \$ 22.495.974,32 |
|                                                                  | \$ 26.626.367 | 17/01/2022 | 16/02/2022 | 31 | 19,20% | \$ 440.222,60 | \$ 22.936.196,92 |
|                                                                  | \$ 26.626.367 | 17/02/2022 | 16/03/2022 | 28 | 19,20% | \$ 397.620,41 | \$ 23.333.817,34 |
|                                                                  | \$ 26.626.367 | 17/03/2022 | 16/04/2022 | 31 | 19,20% | \$ 440.222,60 | \$ 23.774.039,94 |
|                                                                  | \$ 26.626.367 | 17/04/2022 | 16/05/2022 | 30 | 19,20% | \$ 426.021,87 | \$ 24.200.061,81 |
|                                                                  | \$ 26.626.367 | 17/05/2022 | 16/06/2022 | 31 | 19,20% | \$ 440.222,60 | \$ 24.640.284,41 |
|                                                                  | \$ 26.626.367 | 17/06/2022 | 16/07/2022 | 30 | 19,20% | \$ 426.021,87 | \$ 25.066.306,28 |
|                                                                  | \$ 26.626.367 | 17/07/2022 | 16/08/2022 | 31 | 19,20% | \$ 440.222,60 | \$ 25.506.528,89 |
|                                                                  | \$ 26.626.367 | 17/08/2022 | 16/09/2022 | 31 | 19,20% | \$ 440.222,60 | \$ 25.946.751,49 |
|                                                                  | \$ 26.626.367 | 17/09/2022 | 16/10/2022 | 30 | 19,20% | \$ 426.021,87 | \$ 26.372.773,36 |
|                                                                  | \$ 26.626.367 | 17/10/2022 | 16/11/2022 | 31 | 19,20% | \$ 440.222,60 | \$ 26.812.995,96 |
|                                                                  | \$ 26.626.367 | 17/11/2022 | 16/12/2022 | 30 | 19,20% | \$ 426.021,87 | \$ 27.239.017,83 |
|                                                                  | \$ 26.626.367 | 17/12/2022 | 16/01/2023 | 31 | 19,20% | \$ 440.222,60 | \$ 27.679.240,43 |
|                                                                  | \$ 26.626.367 | 17/01/2023 | 16/02/2023 | 31 | 19,20% | \$ 440.222,60 | \$ 28.119.463,03 |
|                                                                  | \$ 26.626.367 | 17/02/2023 | 1/03/2023  | 13 | 19,20% | \$ 184.609,48 | \$ 28.304.072,51 |