

Señora
JUEZ SEGUNDO PROMISCOU DE FAMILIA
Palmira, Valle del Cauca.

REF. PROCESO UNION MARITAL DE HECHO
DTE. GLENDA IRIS OLAZAGASTI
DDO. DIEGO FERNANDO APRAÉZ MILLÁN
RAD. 2021-00188-00.

EXCEPCIONES:

EXCEPCION PREVIA DE FALTA DE COMPETENCIA POR EL FACTOR TERRITORIAL.

Las excepciones previas tienen por objeto, atacar el ejercicio del medio de control, por presentarse alguna inconsistencia en la manera como fue presentada la demanda, vale decir, por alguna deficiencia externa, o en otros términos por aspectos formales insitos en el libelo.

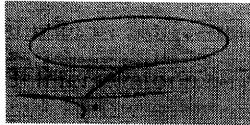
Ahora, el factor territorial es aquella designación del juez que, de entre los que están en un mismo grado, su sede lo haga el más idóneo o natural para un caso en concreto. El criterio principal o fuero general lo constituye la TERRITORIALIDAD O LA VECINDAD EN DONDE SE ENCUENTRE LOS ELEMENTOS DEL PROCESO, PERSONAS O COSAS.

En el caso presente, la persona que demanda Glenda Iris Olazagasti y el demandado, señor Diego Fernando Apráez Millán, no residen en el territorio nacional, sus residencias han estado y están ubicada en los Estados Unidos. E insisto, entre ellos existió un matrimonio, y su posterior divorcio y liquidación de sociedad patrimonial, tuvieron y han tenido su origen y desarrollo en los Estados Unidos, por tanto, su convivencia y desarrollo patrimonial tuvo su origen allá, donde igualmente procrearon un único hijo. Mi poderdante allega como prueba de su residencia permanente en los Estado Unidos de Américas, su hoja de vida laboral y los Registros en el Pasaporte de los ingresos a ese país. Como si lo anterior fuese poco, la demandante señora Olazagasti, no es nacional, su nacionalidad es Puerto Riqueña. Todos estos aspectos honorable juez, la hacen a usted incompetente por el factor territorial para avocar y conocer del desarrollo del presente caso, debiendo por ello declararse incompetente y rechazar la presente acción, bajo los mandatos del Art.28 C.G.P. Art. 1.

PRUEBAS.

- 1 - Como prueba de esta excepción, permíteme aportar copia del acta de matrimonio, de la Sentencia de divorcio y liquidación de la sociedad patrimonial, todo ello realizado en los Estados Unidos. Dichas copias se aportan traducidas al español.
- 2 – Hoja de vida laboral y los Registros en el Pasaporte de los ingresos del Señor Apraéz a Los Estados Unidos de Norteamérica, demostrando su residencia desde hace más de 20 años en ese país.
- 3- Interrogatorio de parte. Solicito se decrete interrogatorio de parte a la actora señora Glenda Iris Olazagasti que le formularé en su momento oportuno, relacionado con esta excepción.
- 4- TESTIMONIAL. Recepcionar el testimonio del señor RAMIRO BALLESTEROS CHICA, mayor y vecino de esta ciudad, residente en Palmira, identificado con cédula de ciudadanía No16.259.546, con residencia en la carrera 29 No. 32-146 Apto.404. EMAIL. ramiroballesterochica@gmail.com quien declarará todo lo que conste relacionado con esta excepción.

Atentamente,



OSCAR HURTADO TORRES
CC. 6.286.446
T.P. 122697 C.S.J.

Department of Health • Vital Statistics
**STATE OF FLORIDA
MARRIAGE RECORD**
TYPE IN UPPER CASE
USE BLACK INK

This license not valid unless seal of Clerk
Circuit or County Court, Assessors Marriage

(STATE FILE NUMBER)

DEC 1 4 2004

RECORDED: BOOK 350 PAGE 2488

HOWARD C. FORMAN, CLERK OF COURT

BY *JL*, DEPUTY CLERK

ML-CB-04-004042

(APPLICATION NUMBER)

APPLICATION TO MARRY

1. GROOM'S NAME (LAST, FIRST, MIDDLE)	2. DATE OF BIRTH (Month, Day, Year)		
DIEGO FERNANDO APPAREZ	FEB 27, 1980		
3. RESIDENCE CITY/TOWN OR LOCATION	4. COUNTY	5. STATE	6. BIRTHPLACE (State or Foreign Country)
PORT LAUDERDALE	BROWARD	FLORIDA	COLOMBIA
7. MILE'S NAME (LAST, FIRST, MIDDLE)	8. DATE OF BIRTH (Month, Day, Year)		
IGLENSA IRIS OLAZAGASTI	MAR 28, 1981		
9. RESIDENCE CITY/TOWN OR LOCATION	10. COUNTY	11. STATE	12. BIRTHPLACE (State or Foreign Country)
PORT LAUDERDALE	BROWARD	FLORIDA	PUERTO RICO
13. THE APPLICANTS NAMED IN THIS CERTIFICATE, EACH FOR HIMSELF OR HERSELF, STATE THAT THE INFORMATION PROVIDED ON THIS DOCUMENT IS CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THAT NO LEGAL OBSTACLE TO THE MARRIAGE NOR THE ISSUANCE OF A LICENSE TO AUTHORIZE THE SAME IS KNOWN TO US, AND HEREBY APPLIES FOR LICENSE TO MARRY.			
14. SIGNATURE OF GROOM (Sign full name using black ink)		15. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)	
<i>Roger Fernando Apparez</i>		NOV 15, 2004	
16. TITLE OF OFFICIAL		17. SIGNATURE OF OFFICIAL (Use black ink)	
DEPUTY CLERK R. LICATA		<i>R. Licata</i>	
18. SIGNATURE OF BRIDE (Sign full name using black ink)		19. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)	
<i>Iglenza Iris Olazagasti</i>		NOV 15, 2004	
20. TITLE OF OFFICIAL		21. SIGNATURE OF OFFICIAL (Use black ink)	
DEPUTY CLERK R. LICATA		<i>R. Licata</i>	

LICENSE TO MARRY

APPLICANTS HAVE BEEN AND ARE HEREBY GIVEN A DAY PERIOD DURING WHICH THE LAWS OF THE STATE OF FLORIDA TO PERFORM A MARRIAGE CEREMONY WITHIN THE STATE OF FLORIDA AND TO SOLICITING THE MARRIAGE OF THE ABOVE NAMED PERSONS. THIS LICENSE WILL BE USED ONLY AFTER THE EFFECTIVE DATE AND ON OR BEFORE THE EXPIRATION DATE IN THE STATE OF FLORIDA IN ORDER TO BE RECORDED AND VALID.			
22. COUNTY ISSUING LICENSE	23. DATE LICENSE ISSUED	24. DATE LICENSE BEGINS	25. EXPIRATION DATE
BROWARD	NOV 15, 2004	NOV 18, 2004	JAN 16, 2005
26. SIGNATURE OF COURT CLERK OR JUDGE	27. TITLE		
<i>R. Licata</i>	DEPUTY CLERK R. LICATA		

CERTIFICATE OF MARRIAGE

28. I HEREBY CERTIFY THAT THE ABOVE NAMED GROOM AND BRIDE WERE JOINED BY ME IN MARRIAGE IN ACCORDANCE WITH THE LAWS OF THE STATE OF FLORIDA	29. DATE OF MARRIAGE (Month, Day, Year)	30. CITY, TOWN, OR LOCATION OF MARRIAGE	31. ADDRESS OF MARRIAGE (Street, City, Zip)
<i>Nov 20 2004</i>	<i>Nov 20, 2004</i>	<i>Fort Lauderdale, Florida</i>	<i>5226 NE 2nd Ave Ft. Lauderdale, FL 33304</i>
32. SIGNATURE OF PERSON PERFORMING CEREMONY (Use black ink)	33. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)	34. SIGNATURE OF MARRIAGE OFFICIANT (Use black ink)	
<i>Roger Alexis Medina</i>	<i>Mauricio Valdes</i>	<i>Roger Alexis Medina</i>	
35. NAME AND TITLE OF PERSON PERFORMING CEREMONY	36. NAME AND TITLE OF WITNESS TO CEREMONY	37. NAME AND TITLE OF MARRIAGE OFFICIANT	
Commission # DO310116			
Expires April 17, 2005			

SEAL

38. GROOM	39. GROOM'S SOCIAL SECURITY NUMBER	40. GROOM'S DRIVERS LICENSE NUMBER	41. GROOM'S RACE	42. GROOM'S HISPANIC OR NON-HISPANIC STATUS	43. GROOM'S PREVIOUSLY MARRIED	44. GROOM'S LAST MARRIAGE NUMBER	45. GROOM'S LAST MARRIAGE DATE
		FL DRIVER LIC A152166800670	HISPANIC	XX NO YES	01		
46. BRIDE	47. BRIDE'S SOCIAL SECURITY NUMBER	48. BRIDE'S DRIVERS LICENSE NUMBER	49. BRIDE'S RACE	50. BRIDE'S HISPANIC OR NON-HISPANIC STATUS	51. BRIDE'S PREVIOUSLY MARRIED	52. BRIDE'S LAST MARRIAGE NUMBER	53. BRIDE'S LAST MARRIAGE DATE
		584-81-4424	HISPANIC	XX NO YES	01		

DIEGO APRAEZ

Inventory Manager coordinator

Boca Raton, Florida, United States
 +19545365908
 diegoapraez0227@gmail.com

SUMMARY

The total years of service for SPEEDWAY were 11 years since the time of HESS, having functions like Friendly, responsible, and determined person with excellent customer service and leadership skill.

Several certifications from Speedway on outstanding performance, awards and recognition for excellent Executing Manager, Speedy rewards, Selling Point, Train The trainer and nominations for manager of the quarter.
Participation on the Senior General Manager Advisory Board.

WORK EXPERIENCE

November 2021-Current

Inventory Manager coordinator

ANABI OIL(REBEL)
 United States

Responsibilities: Create detail reports for adjustments, inventory operations and stock levels. This includes everything from inventory tracking to conducting an inventory audit to audit. Reviewed the final report from external auditors (QUAMTUM) determinate variances levels negative or positive different categories.

February 2019-October 2021

Audit coordinator

SPEEDWAY LLC
 United States

Responsibilities: Documentation management, Finance and accounting skills. Works with all external auditors (QUANTUM, RIGIS OR H&M) in coordinating audit activities. Assists district personnel and performs internal audits of district departments. The most recent project I did was the sale of the store that ANABI bought from speedway. The need of auditing is to inspect overall operations of the company and their effectiveness.

October 2012-January 2018

General Manager

SPEEDWAY LLC
 United States

Responsibilities:

- Oversee and provide customer service leadership, training, and coaching for all store employees.
- Maintaining high retention by focusing on identifying qualified applicants, developing leaders, empowering employees, and encouraging employee productivity.

- Maintaining a clean, safe environment by complying with all health and sanitation procedures to ensure the store is presentable and that all products are in-stock.
- Assist in implementing all merchandising and marketing programs.
- Cash handling, fuel transactions, and promoting the Speedy Rewards loyalty program.
- The ability to multi-task, perform repeated bending, standing, and reaching, and occasionally lifting up to 50 pounds.
- Execute all procedures stated by the company to achieve goals daily, monthly, and yearly.

January 2018-2018

Temp Food conversion coordinator

■ SPEEDWAY LLC
📍 United States

June 2018

Responsibilities: To effectively train staff, work with Programs and supervisors, managers to insure that all records, policies, regulations and safety factor procedures.

Speedway implement new food programs
ISMS and ISMB.

January 2009-October 2012

Customer Service Representative and Food Service Specialist

■ SPEEDWAY LLC
📍 United States

Responsibilities:

- Meeting and exceeding customer expectations on every visit.
- Maintaining a clean, safe environment to ensure the store is presentable.
- Food preparation including making one of our customer-favorites coffee!
- Ensuring proper preparation, presentation, and freshness of all foodservice products.
- Cash handling, fuel transactions, and promoting the Speedy Rewards loyalty program.
- The ability to multi-task, perform repeated bending, standing, and reaching, and occasionally lifting up to 50 pounds.

March 2004-December 2008

Project Manager

■ Bell Painting
📍 United States

Responsibilities:

- Plan, budget, oversee and document all aspects of the specific project.
- Work closely with upper management to make sure that the scope and direction of each project is on schedule, as well as other departments for support.
- Work by myself or be in charge of a team to get the job done.

March 2000-March 2004

Painter Supervisor

 Bell Painting
 United States

Responsibilities:

- Finalize projects on time involving painting jobs.
- Make orders of paint, tools, equipment, etc.
- Keep a safety work environment
- Handle employee's salary, hours, and payroll.

Skills

Fluent in the use of Microsoft Word, Excel, typing. Speak and write fluent English and Spanish. I have taken a marketing and finance course and understand the importance of outstanding customer services

Achievements

- Speedway- Clark State Community College
Springfield, Ohio
Retail Leadership Training.

-Train the Trainer Certification

Referencies

Juan Guerra, District Manager
Speedway LLC
954-540-8476

Ivan Buitagro, Cardiologist
Miami Hospital
786-286-9050

Michael Hanna Field Marketing Coordinator
Speedway LLC
732-425-9788

EDUCATION

-2000

Bussines administration

- 📍 Universidad Santo Tomas Colombia
- 📍 United States

- Universidad Santo Tomas Colombia
- Business Agricola's Administration

Graduation Date - June 12 -2000

- Business Agricola's Administration

-1996

- 📍 Colegio San José de Palmira via Tienda Nueva
- 📍 United States

- Colegio San José de Palmira via Tienda Nueva, Valle del Cauca, Palmira 57 Colombia
- Graduation Date - June 1996
- 4.0 Grade Point Average
- Relevant Courses - Emphasis in Business, Foreign Trade.

SKILLS

- Audit
- Auditing
- Audits
- Internal Audits
- Accounting
- Adjustments
- Budget
- Retail
- Finance
- Marketing
- Merchandising
- Retail Marketing
- Cash Handling
- Retail Sales
- Customer Service
- Sanitation
- Painter
- Coaching
- Payroll
- Customer Service Representative
- Customer Service Oriented
- Typing
- Documentation
- Inventory
- Operations
- Painting
- Food Service
- Excel
- Microsoft Word

HONORS & AWARDS

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LANGUAGES

English - Intermediate

Spanish - Intermediate

WORK AUTHORIZATION

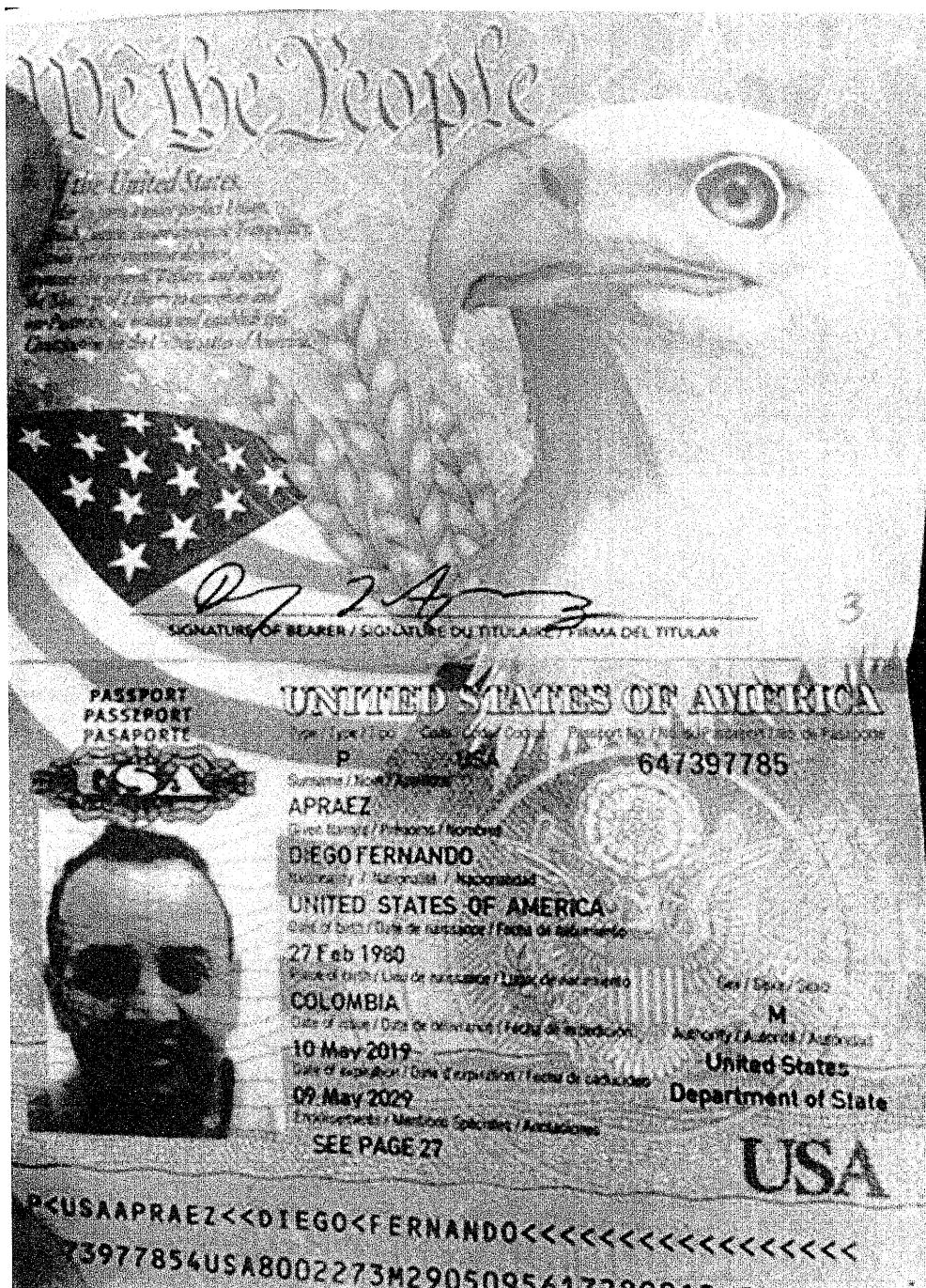
I am authorized to work in the following countries:

- United States













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