

## Memorial Allego Liquidación de credito -- Proceso Ejecutivo de Banco de Occidente VS J&F Ingeniería y Servicio S.A.S Rad 2017/297

Dependiente Judicial 1 <dependientejudicial1jyj@gmail.com>

Vie 14/01/2022 16:19

Para: Juzgado 08 Civil Municipal - Tolima - Ibagué <j08cmpaliba@cendoj.ramajudicial.gov.co>

CC: xxxjgxx <jedni22@hotmail.com>

Cordial saludo,

Por la presente y en archivo adjunto remito imagen de memorial con lo aportado.

Atentamente,

Miller Fabian Lopez Camacho  
Dependiente Judicial  
Dra Jedny Gallego Carmona  
J&J Abogados Asociados S.A.S  
Cll 12 N° 2-43 Of 401 Ed pomponá  
Tel: 3184472615  
(8) 2809194



**JEDNY GALLEGU CARMONA**

Abogada Especialista

Derecho Laboral y Administrativo

Universidad Nacional de Colombia

Derecho Contractual y Relaciones Jurídico Negóciales

Universidad Externado de Colombia

**SEÑOR**

**JUEZ OCTAVO CIVIL MUNICIPAL DE IBAGUÉ.**

**E. S. D.**

**REF: EJECUTIVO BANCO DE OCCIDENTE VS J&F INGENIERIA Y  
SERVICIOS S.A.S**

**RAD: 2017-297**

Al señor Juez por la presente allego **LIQUIDACION DEL CREDITO** del  
proceso de la referencia y solicito su aprobación.

Del Sr Juez,

**JEDNY GALLEGU CARMONA**

**C.C.38.363.060 de Ibagué**

**T.P.161.545 C.S.J.**

LIQUIDACION REQUERIMIENTO JUZGADO

| NOMBRE CLIENTE                   | IDENTIFICACION | CONSECUTIVO |
|----------------------------------|----------------|-------------|
| J Y F INGENIERIA Y SERVICIOS SAS | 900,787,114    | 2532        |

| RESUMEN LIQUIDACION |                    |
|---------------------|--------------------|
| FECHA ELABORACION   | 13/01/2022         |
| FECHA INICIO MORA   | 17/06/2015         |
| FECHA CORTE         | 13/01/2022         |
| DIAS LIQUIDADOS     | 2,403              |
| TOTAL RECONOCIDO    | \$ 39,695,717.00   |
| ABONO CAPITAL       | \$ (16,770,524.00) |
| INTERESES DE MORA   | \$ 39,863,828.00   |
| TOTAL               | \$ 62,789,021.00   |

| RECONOCIDO EN MANDAMIENTO DE PAGO |                  |
|-----------------------------------|------------------|
| CAPITAL                           | \$ 33,541,048.00 |
| INTERESES DE MORA                 | \$ 5,865,466.00  |
| INTERESES CORRIENTES              | \$ 289,203.00    |
| GASTOS                            | \$ -             |
| TOTAL                             | \$ 39,695,717.00 |

| FECHA INICIO | FECHA FIN  | DIAS | TASA MORA EA | ABONO CAPITAL    | SALDO CAPITAL    | INTERESES MORA  | INTERESES CORRIENTES | GASTOS | TOTAL            | OBSERVACION                       |
|--------------|------------|------|--------------|------------------|------------------|-----------------|----------------------|--------|------------------|-----------------------------------|
| 17/06/2015   | 30/06/2015 | 14   | 28.80%       | -                | \$ 33,541,048.00 | \$ 5,865,466.00 | \$ 289,203.00        | \$ -   | \$ 39,695,717.00 | Reconocido en mandamiento de pago |
| 1/07/2015    | 31/07/2015 | 31   | 28.63%       | -                | \$ 33,541,048.00 | \$ 330,245.00   |                      |        | \$ 40,025,963.00 |                                   |
| 1/08/2015    | 31/08/2015 | 31   | 28.63%       | -                | \$ 33,541,048.00 | \$ 727,415.00   |                      |        | \$ 40,753,378.00 |                                   |
| 1/09/2015    | 30/09/2015 | 30   | 28.63%       | -                | \$ 33,541,048.00 | \$ 727,415.00   |                      |        | \$ 41,480,793.00 |                                   |
| 1/10/2015    | 31/10/2015 | 31   | 28.74%       | -                | \$ 33,541,048.00 | \$ 709,950.00   |                      |        | \$ 42,184,743.00 |                                   |
| 1/11/2015    | 30/11/2015 | 30   | 28.74%       | -                | \$ 33,541,048.00 | \$ 729,895.00   |                      |        | \$ 42,914,638.00 |                                   |
| 1/12/2015    | 31/12/2015 | 31   | 28.74%       | -                | \$ 33,541,048.00 | \$ 706,350.00   |                      |        | \$ 43,620,988.00 |                                   |
| 1/01/2016    | 31/01/2016 | 31   | 29.24%       | -                | \$ 33,541,048.00 | \$ 741,117.00   |                      |        | \$ 44,350,883.00 |                                   |
| 1/02/2016    | 29/02/2016 | 29   | 29.24%       | -                | \$ 33,541,048.00 | \$ 693,303.00   |                      |        | \$ 45,092,000.00 |                                   |
| 1/03/2016    | 31/03/2016 | 31   | 29.24%       | -                | \$ 33,541,048.00 | \$ 741,117.00   |                      |        | \$ 45,785,403.00 |                                   |
| 1/04/2016    | 30/04/2016 | 30   | 30.53%       | -                | \$ 33,541,048.00 | \$ 744,990.00   |                      |        | \$ 46,526,420.00 |                                   |
| 1/05/2016    | 31/05/2016 | 31   | 30.53%       | -                | \$ 33,541,048.00 | \$ 769,823.00   |                      |        | \$ 47,271,410.00 |                                   |
| 1/06/2016    | 30/06/2016 | 30   | 30.53%       | -                | \$ 33,541,048.00 | \$ 744,990.00   |                      |        | \$ 48,041,233.00 |                                   |
| 1/07/2016    | 31/07/2016 | 31   | 31.73%       | -                | \$ 33,541,048.00 | \$ 796,266.00   |                      |        | \$ 48,786,223.00 |                                   |
| 1/08/2016    | 31/08/2016 | 31   | 31.73%       | -                | \$ 33,541,048.00 | \$ 796,266.00   |                      |        | \$ 49,582,489.00 |                                   |
| 1/09/2016    | 30/09/2016 | 30   | 31.73%       | -                | \$ 33,541,048.00 | \$ 770,580.00   |                      |        | \$ 50,378,755.00 |                                   |
| 1/10/2016    | 31/10/2016 | 31   | 32.71%       | -                | \$ 33,541,048.00 | \$ 817,687.00   |                      |        | \$ 51,149,335.00 |                                   |
| 1/11/2016    | 30/11/2016 | 30   | 32.71%       | -                | \$ 33,541,048.00 | \$ 791,310.00   |                      |        | \$ 51,967,022.00 |                                   |
| 1/12/2016    | 31/12/2016 | 31   | 32.71%       | -                | \$ 33,541,048.00 | \$ 817,687.00   |                      |        | \$ 52,758,332.00 |                                   |
| 1/01/2017    | 31/01/2017 | 31   | 33.23%       | -                | \$ 33,541,048.00 | \$ 829,002.00   |                      |        | \$ 53,576,019.00 |                                   |
| 1/02/2017    | 28/02/2017 | 28   | 33.23%       | -                | \$ 33,541,048.00 | \$ 748,776.00   |                      |        | \$ 54,405,021.00 |                                   |
| 1/03/2017    | 31/03/2017 | 31   | 33.23%       | -                | \$ 33,541,048.00 | \$ 829,002.00   |                      |        | \$ 55,153,797.00 |                                   |
| 1/04/2017    | 30/04/2017 | 30   | 33.23%       | -                | \$ 33,541,048.00 | \$ 802,260.00   |                      |        | \$ 55,982,799.00 |                                   |
| 1/05/2017    | 31/05/2017 | 31   | 33.23%       | -                | \$ 33,541,048.00 | \$ 829,002.00   |                      |        | \$ 56,785,059.00 |                                   |
| 1/06/2017    | 30/06/2017 | 30   | 33.23%       | -                | \$ 33,541,048.00 | \$ 802,260.00   |                      |        | \$ 57,614,061.00 |                                   |
| 1/07/2017    | 31/07/2017 | 31   | 32.70%       | -                | \$ 33,541,048.00 | \$ 817,470.00   |                      |        | \$ 58,416,321.00 |                                   |
| 1/08/2017    | 31/08/2017 | 31   | 32.70%       | -                | \$ 33,541,048.00 | \$ 817,470.00   |                      |        | \$ 59,233,791.00 |                                   |
| 1/09/2017    | 30/09/2017 | 30   | 31.95%       | -                | \$ 33,541,048.00 | \$ 775,230.00   |                      |        | \$ 60,051,261.00 |                                   |
| 1/10/2017    | 31/10/2017 | 31   | 31.73%       | -                | \$ 33,541,048.00 | \$ 796,266.00   |                      |        | \$ 60,826,491.00 |                                   |
| 1/11/2017    | 31/11/2017 | 17   | 31.44%       | \$ 16,770,524.00 | \$ 16,770,524.00 | \$ 339,308.67   |                      |        | \$ 61,622,757.00 | Abogo FNG Obligación No 2532      |
| 1/12/2017    | 30/12/2017 | 13   | 31.44%       | -                | \$ 16,770,524.00 | \$ 259,471.33   |                      |        | \$ 45,191,541.67 |                                   |
| 1/01/2018    | 31/01/2018 | 31   | 31.16%       | -                | \$ 16,770,524.00 | \$ 391,871.00   |                      |        | \$ 45,451,013.00 |                                   |
| 1/02/2018    | 28/02/2018 | 28   | 31.25%       | -                | \$ 16,770,524.00 | \$ 387,562.00   |                      |        | \$ 45,842,894.00 |                                   |
| 1/03/2018    | 31/03/2018 | 31   | 30.75%       | -                | \$ 16,770,524.00 | \$ 354,844.00   |                      |        | \$ 46,230,446.00 |                                   |
| 1/04/2018    | 30/04/2018 | 30   | 30.45%       | -                | \$ 16,770,524.00 | \$ 387,345.00   |                      |        | \$ 46,585,290.00 |                                   |
| 1/05/2018    | 31/05/2018 | 31   | 30.45%       | -                | \$ 16,770,524.00 | \$ 371,640.00   |                      |        | \$ 46,972,635.00 |                                   |
| 1/06/2018    | 30/06/2018 | 30   | 30.15%       | -                | \$ 16,770,524.00 | \$ 384,028.00   |                      |        | \$ 47,344,275.00 |                                   |
| 1/07/2018    | 31/07/2018 | 31   | 29.78%       | -                | \$ 16,770,524.00 | \$ 369,400.00   |                      |        | \$ 47,728,303.00 |                                   |
| 1/08/2018    | 31/08/2018 | 31   | 29.64%       | -                | \$ 16,770,524.00 | \$ 375,007.00   |                      |        | \$ 48,096,703.00 |                                   |
| 1/09/2018    | 30/09/2018 | 30   | 29.45%       | -                | \$ 16,770,524.00 | \$ 360,870.00   |                      |        | \$ 48,473,291.00 |                                   |
| 1/10/2018    | 31/10/2018 | 31   | 29.18%       | -                | \$ 16,770,524.00 | \$ 369,892.00   |                      |        | \$ 48,848,298.00 |                                   |
| 1/11/2018    | 30/11/2018 | 30   | 28.97%       | -                | \$ 16,770,524.00 | \$ 355,680.00   |                      |        | \$ 49,209,168.00 |                                   |
| 1/12/2018    | 31/12/2018 | 31   | 28.83%       | -                | \$ 16,770,524.00 | \$ 365,955.00   |                      |        | \$ 49,579,060.00 |                                   |
|              |            |      |              |                  |                  |                 |                      |        | \$ 49,934,740.00 |                                   |
|              |            |      |              |                  |                  |                 |                      |        | \$ 50,300,695.00 |                                   |

LIQUIDACION REQUERIMIENTO JUZGADO

| NOMBRE CLIENTE                   | IDENTIFICACION | CONSECUTIVO |
|----------------------------------|----------------|-------------|
| J Y F INGENIERIA Y SERVICIOS SAS | 900,787,114    | 2552        |

| RESUMEN LIQUIDACION |                    |
|---------------------|--------------------|
| FECHA ELABORACION   | 13/01/2022         |
| FECHA INICIO MORA   | 17/06/2015         |
| FECHA CORTE         | 13/01/2022         |
| DIAS LIQUIDADOS     | 2,403              |
| TOTAL RECONOCIDO    | \$ 39,695,717.00   |
| ABONO CAPITAL       | \$ (16,770,524.00) |
| INTERESES DE MORA   | \$ 39,863,828.00   |
| TOTAL               | \$ 62,789,021.00   |

| RECONOCIDO EN MANDAMIENTO DE PAGO |                  |
|-----------------------------------|------------------|
| CAPITAL                           | \$ 33,541,048.00 |
| INTERESES DE MORA                 | \$ 5,865,466.00  |
| INTERESES CORRIENTES              | \$ 289,203.00    |
| GASTOS                            | \$ -             |
| TOTAL                             | \$ 39,695,717.00 |

| FECHA INICIO      | FECHA FIN  | DIAS | TASA MORA EA | ABONO CAPITAL | SALDO CAPITAL    | INTERESES MORA   | INTERESES CORRIENTES | GASTOS | TOTAL            | OBSERVACION |
|-------------------|------------|------|--------------|---------------|------------------|------------------|----------------------|--------|------------------|-------------|
| 1/01/2019         | 31/01/2019 | 31   | 28.47%       | -             | \$ 16,770,524.00 | \$ 361,925.00    |                      |        | \$ 50,662,620.00 |             |
| 1/02/2019         | 28/02/2019 | 28   | 29.28%       | -             | \$ 16,770,524.00 | \$ 335,104.00    |                      |        | \$ 50,997,724.00 |             |
| 1/03/2019         | 31/03/2019 | 31   | 28.79%       | -             | \$ 16,770,524.00 | \$ 365,521.00    |                      |        | \$ 51,363,245.00 |             |
| 1/04/2019         | 30/04/2019 | 30   | 28.79%       | -             | \$ 16,770,524.00 | \$ 353,730.00    |                      |        | \$ 51,716,975.00 |             |
| 1/05/2019         | 31/05/2019 | 31   | 28.79%       | -             | \$ 16,770,524.00 | \$ 365,521.00    |                      |        | \$ 52,082,496.00 |             |
| 1/06/2019         | 30/06/2019 | 30   | 28.79%       | -             | \$ 16,770,524.00 | \$ 353,730.00    |                      |        | \$ 52,436,226.00 |             |
| 1/07/2019         | 31/07/2019 | 31   | 28.79%       | -             | \$ 16,770,524.00 | \$ 365,521.00    |                      |        | \$ 52,801,747.00 |             |
| 1/08/2019         | 31/08/2019 | 31   | 28.79%       | -             | \$ 16,770,524.00 | \$ 365,521.00    |                      |        | \$ 53,167,268.00 |             |
| 1/09/2019         | 30/09/2019 | 30   | 28.79%       | -             | \$ 16,770,524.00 | \$ 353,730.00    |                      |        | \$ 53,520,998.00 |             |
| 1/10/2019         | 31/10/2019 | 31   | 28.46%       | -             | \$ 16,770,524.00 | \$ 361,801.00    |                      |        | \$ 53,882,799.00 |             |
| 1/11/2019         | 30/11/2019 | 30   | 28.36%       | -             | \$ 16,770,524.00 | \$ 349,050.00    |                      |        | \$ 54,231,849.00 |             |
| 1/12/2019         | 31/12/2019 | 31   | 28.18%       | -             | \$ 16,770,524.00 | \$ 358,639.00    |                      |        | \$ 54,590,488.00 |             |
| 1/01/2020         | 31/01/2020 | 31   | 28.16%       | -             | \$ 16,770,524.00 | \$ 358,422.00    |                      |        | \$ 54,948,910.00 |             |
| 1/02/2020         | 29/02/2020 | 29   | 28.40%       | -             | \$ 16,770,524.00 | \$ 337,821.00    |                      |        | \$ 55,286,731.00 |             |
| 1/03/2020         | 31/03/2020 | 31   | 28.43%       | -             | \$ 16,770,524.00 | \$ 361,460.00    |                      |        | \$ 55,648,191.00 |             |
| 1/04/2020         | 30/04/2020 | 30   | 28.04%       | -             | \$ 16,770,524.00 | \$ 345,540.00    |                      |        | \$ 55,993,731.00 |             |
| 1/05/2020         | 31/05/2020 | 31   | 27.29%       | -             | \$ 16,770,524.00 | \$ 348,595.00    |                      |        | \$ 56,342,326.00 |             |
| 1/06/2020         | 30/06/2020 | 30   | 27.18%       | -             | \$ 16,770,524.00 | \$ 336,120.00    |                      |        | \$ 56,678,446.00 |             |
| 1/07/2020         | 31/07/2020 | 31   | 27.44%       | -             | \$ 16,770,524.00 | \$ 347,324.00    |                      |        | \$ 57,025,770.00 |             |
| 1/08/2020         | 31/08/2020 | 31   | 27.44%       | -             | \$ 16,770,524.00 | \$ 350,269.00    |                      |        | \$ 57,376,039.00 |             |
| 1/09/2020         | 30/09/2020 | 30   | 27.53%       | -             | \$ 16,770,524.00 | \$ 339,960.00    |                      |        | \$ 57,715,999.00 |             |
| 1/10/2020         | 31/10/2020 | 31   | 27.14%       | -             | \$ 16,770,524.00 | \$ 346,890.00    |                      |        | \$ 58,062,889.00 |             |
| 1/11/2020         | 30/11/2020 | 30   | 26.76%       | -             | \$ 16,770,524.00 | \$ 331,500.00    |                      |        | \$ 58,394,389.00 |             |
| 1/12/2020         | 31/12/2020 | 31   | 26.19%       | -             | \$ 16,770,524.00 | \$ 336,040.00    |                      |        | \$ 58,730,429.00 |             |
| 1/01/2021         | 31/01/2021 | 31   | 25.98%       | -             | \$ 16,770,524.00 | \$ 333,622.00    |                      |        | \$ 59,064,051.00 |             |
| 1/02/2021         | 28/02/2021 | 28   | 25.98%       | -             | \$ 16,770,524.00 | \$ 301,336.00    |                      |        | \$ 59,365,387.00 |             |
| 1/03/2021         | 31/03/2021 | 31   | 25.98%       | -             | \$ 16,770,524.00 | \$ 333,622.00    |                      |        | \$ 59,699,009.00 |             |
| 1/04/2021         | 30/04/2021 | 30   | 25.97%       | -             | \$ 16,770,524.00 | \$ 322,770.00    |                      |        | \$ 60,021,779.00 |             |
| 1/05/2021         | 31/05/2021 | 31   | 25.83%       | -             | \$ 16,770,524.00 | \$ 331,917.00    |                      |        | \$ 60,353,696.00 |             |
| 1/06/2021         | 30/06/2021 | 30   | 25.82%       | -             | \$ 16,770,524.00 | \$ 321,090.00    |                      |        | \$ 60,674,786.00 |             |
| 1/07/2021         | 31/07/2021 | 31   | 25.77%       | -             | \$ 16,770,524.00 | \$ 331,235.00    |                      |        | \$ 61,006,021.00 |             |
| 1/08/2021         | 31/08/2021 | 31   | 25.86%       | -             | \$ 16,770,524.00 | \$ 332,558.00    |                      |        | \$ 61,338,579.00 |             |
| 1/09/2021         | 30/09/2021 | 30   | 25.79%       | -             | \$ 16,770,524.00 | \$ 320,760.00    |                      |        | \$ 61,659,039.00 |             |
| 1/10/2021         | 31/10/2021 | 31   | 25.62%       | -             | \$ 16,770,524.00 | \$ 329,499.00    |                      |        | \$ 61,988,538.00 |             |
| 1/11/2021         | 30/11/2021 | 30   | 25.91%       | -             | \$ 16,770,524.00 | \$ 322,080.00    |                      |        | \$ 62,310,618.00 |             |
| 1/12/2021         | 31/12/2021 | 31   | 26.19%       | -             | \$ 16,770,524.00 | \$ 336,040.00    |                      |        | \$ 62,646,658.00 |             |
| 1/01/2022         | 13/01/2022 | 13   | 26.49%       | -             | \$ 16,770,524.00 | \$ 142,363.00    |                      |        | \$ 62,789,021.00 |             |
| TOTAL LIQUIDACION |            |      |              |               | \$ 16,770,524.00 | \$ 45,729,294.00 | \$ 289,203.00        | \$ -   | \$ 62,789,021.00 |             |