

MEMORIAL ALLEGO ACT LQ RAD: 2019-00559

Daniel Dallos <danieldallos@gmail.com>

Vie 12/01/2024 10:16 AM

Para:Juzgado 01 Civil Municipal - N. De Santander - Los Patios <j01cmunicipallospat@cendoj.ramajudicial.gov.co>

📎 1 archivos adjuntos (184 KB)
MEMORIAL ALLEGA ACT LQ.pdf;



Cordial saludo, por favor acusar recibo de este correo.

Atentamente,

Daniel Dallos
Abogado Externo



Señor
JUZGADO CIVIL MUNICIPAL DE LOS PATIOS
E.S.D.

RADICADO: 2019-00559
DEMANDANTE: BANCO AGRARIO DE COLOMBIA S.A.
DEMANDADO: MARIA FRANCELINA PRIETO HERNANDEZ
C.C 60.304.262

En mi calidad de apoderado judicial de la parte demandante en el proceso de la referencia, me permito allegar a su Honorable Despacho la liquidación de crédito, acorde con el mandamiento de pago, y el auto que ordena seguir adelante la ejecución, lo anterior de conformidad con el artículo 446 del C.G.P.

Por el pagare No. **051016100018519** que respalda la obligación No. **725051010286260**, que al sumar todos sus valores da un total de **QUINCE MILLONES OCHOCIENTOS VEINTIOCHO MIL CUATROCIENTOS OCHENTA Y NUEVE (\$ 15.828.489)**, con fecha de corte 31 de diciembre de 2023.

Por el pagare No. **051016100018031** que respalda la obligación No. **725051010279662**, que al sumar todos sus valores da un total de **CINCO MILLONES NOVENTA MIL QUINIENTOS SESENTA Y OCHO (\$ 5.090.568)**, con fecha de corte 31 de diciembre de 2023.

Para un total de **VEINTE MILLONES NOVECIENTOS DIECINUEVE MIL CINCUENTA Y SIETE PESOS M/CTE (\$ 20.919.057)**

Solicito se le corra traslado de conformidad con el artículo 110 C.G.P., y si no es objetada se proceda a su aprobación.

Atentamente,

DANIEL ALFREDO DALLOS CASTELLANOS
C.C. 1.090.393.311 de Cúcuta
T.P. No. 224.031 del C.S. de la J.

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Cúcuta - Norte de Santander



Obligación : 725051010286260 - # Pagare : 051016100018519

DESDE	HASTA	CAPITAL	INTERES MES	INTERES ACUMULADO	TASA BASE	TASA
21-01-2019	31-01-2019	\$ 5.771.959,00	\$ 50.687,45	\$ 50.687,45	%28.74	%2.4
01-02-2019	28-02-2019	\$ 5.771.959,00	\$ 132.658,96	\$ 183.346,41	%29.55	%2.46
01-03-2019	31-03-2019	\$ 5.771.959,00	\$ 144.436,75	\$ 327.783,16	%29.06	%2.42
01-04-2019	30-04-2019	\$ 5.771.959,00	\$ 139.392,90	\$ 467.176,06	%28.98	%2.42
01-05-2019	31-05-2019	\$ 5.771.959,00	\$ 144.188,44	\$ 611.364,50	%29.01	%2.42
01-06-2019	30-06-2019	\$ 5.771.959,00	\$ 139.248,60	\$ 750.613,10	%28.95	%2.41
01-07-2019	31-07-2019	\$ 5.771.959,00	\$ 143.741,11	\$ 894.354,21	%28.92	%2.41
01-08-2019	31-08-2019	\$ 5.771.959,00	\$ 144.039,33	\$ 1.038.393,54	%28.98	%2.42
01-09-2019	30-09-2019	\$ 5.771.959,00	\$ 139.392,90	\$ 1.177.786,44	%28.98	%2.42
01-10-2019	31-10-2019	\$ 5.771.959,00	\$ 142.399,12	\$ 1.320.185,56	%28.65	%2.39
01-11-2019	30-11-2019	\$ 5.771.959,00	\$ 137.324,40	\$ 1.457.509,96	%28.55	%2.38
01-12-2019	31-12-2019	\$ 5.771.959,00	\$ 141.007,22	\$ 1.598.517,18	%28.37	%2.36
01-01-2020	31-01-2020	\$ 5.771.959,00	\$ 139.963,45	\$ 1.738.480,63	%28.16	%2.35
01-02-2020	29-02-2020	\$ 5.771.959,00	\$ 132.933,10	\$ 1.871.413,73	%28.59	%2.38
01-03-2020	31-03-2020	\$ 5.771.959,00	\$ 141.305,44	\$ 2.012.719,17	%28.43	%2.37
01-04-2020	30-04-2020	\$ 5.771.959,00	\$ 134.871,30	\$ 2.147.590,47	%28.04	%2.34
01-05-2020	31-05-2020	\$ 5.771.959,00	\$ 135.639,57	\$ 2.283.230,04	%27.29	%2.27
01-06-2020	30-06-2020	\$ 5.771.959,00	\$ 130.734,90	\$ 2.413.964,94	%27.18	%2.27
01-07-2020	31-07-2020	\$ 5.771.959,00	\$ 135.092,73	\$ 2.549.057,67	%27.18	%2.27
01-08-2020	31-08-2020	\$ 5.771.959,00	\$ 136.385,12	\$ 2.685.442,79	%27.44	%2.29
01-09-2020	30-09-2020	\$ 5.771.959,00	\$ 132.418,50	\$ 2.817.861,29	%27.53	%2.29
01-10-2020	31-10-2020	\$ 5.771.959,00	\$ 134.894,02	\$ 2.952.755,31	%27.14	%2.26
01-11-2020	30-11-2020	\$ 5.771.959,00	\$ 128.714,70	\$ 3.081.470,01	%26.76	%2.23
01-12-2020	31-12-2020	\$ 5.771.959,00	\$ 130.172,10	\$ 3.211.642,11	%26.19	%2.18
01-01-2021	31-01-2021	\$ 5.771.959,00	\$ 129.128,33	\$ 3.340.770,44	%25.98	%2.17
01-02-2021	28-02-2021	\$ 5.771.959,00	\$ 118.113,52	\$ 3.458.883,96	%26.31	%2.19

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12

DESDE	HASTA	CAPITAL	INTERES MES	INTERES ACUMULADO	TASA BASE	TASA
01-03-2021	31-03-2021	\$ 5.771.959,00	\$ 129.824,28	\$ 3.588.708,24	%26.12	%2.18
01-04-2021	30-04-2021	\$ 5.771.959,00	\$ 124.914,90	\$ 3.713.623,14	%25.97	%2.16
01-05-2021	31-05-2021	\$ 5.771.959,00	\$ 128.382,78	\$ 3.842.005,92	%25.83	%2.15
01-06-2021	30-06-2021	\$ 5.771.959,00	\$ 124.193,40	\$ 3.966.199,32	%25.82	%2.15
01-07-2021	31-07-2021	\$ 5.771.959,00	\$ 128.084,56	\$ 4.094.283,88	%25.77	%2.15
01-08-2021	31-08-2021	\$ 5.771.959,00	\$ 128.531,89	\$ 4.222.815,77	%25.86	%2.16
01-09-2021	30-09-2021	\$ 5.771.959,00	\$ 124.049,10	\$ 4.346.864,87	%25.79	%2.15
01-10-2021	31-10-2021	\$ 5.771.959,00	\$ 127.339,01	\$ 4.474.203,88	%25.62	%2.14
01-11-2021	30-11-2021	\$ 5.771.959,00	\$ 124.626,30	\$ 4.598.830,18	%25.91	%2.16
01-12-2021	31-12-2021	\$ 5.771.959,00	\$ 130.172,10	\$ 4.729.002,28	%26.19	%2.18
01-01-2022	31-01-2022	\$ 5.771.959,00	\$ 131.663,20	\$ 4.860.665,48	%26.49	%2.21
01-02-2022	28-02-2022	\$ 5.771.959,00	\$ 123.231,36	\$ 4.983.896,84	%27.45	%2.29
01-03-2022	31-03-2022	\$ 5.771.959,00	\$ 137.727,11	\$ 5.121.623,95	%27.71	%2.31
01-04-2022	30-04-2022	\$ 5.771.959,00	\$ 137.468,70	\$ 5.259.092,65	%28.58	%2.38
01-05-2022	31-05-2022	\$ 5.771.959,00	\$ 146.971,62	\$ 5.406.064,27	%29.57	%2.46
01-06-2022	30-06-2022	\$ 5.771.959,00	\$ 147.185,10	\$ 5.553.249,37	%30.6	%2.55
01-07-2022	31-07-2022	\$ 5.771.959,00	\$ 158.651,80	\$ 5.711.901,17	%31.92	%2.66
01-08-2022	31-08-2022	\$ 5.771.959,00	\$ 165.610,37	\$ 5.877.511,54	%33.32	%2.78
01-09-2022	30-09-2022	\$ 5.771.959,00	\$ 169.551,30	\$ 6.047.062,84	%35.25	%2.94
01-10-2022	31-10-2022	\$ 5.771.959,00	\$ 183.503,26	\$ 6.230.566,10	%36.92	%3.08
01-11-2022	30-11-2022	\$ 5.771.959,00	\$ 186.001,50	\$ 6.416.567,60	%38.67	%3.22
01-12-2022	31-12-2022	\$ 5.771.959,00	\$ 206.068,47	\$ 6.622.636,07	%41.46	%3.46
01-01-2023	31-01-2023	\$ 5.771.959,00	\$ 215.015,07	\$ 6.837.651,14	%43.26	%3.61
01-02-2023	28-02-2023	\$ 5.771.959,00	\$ 203.230,72	\$ 7.040.881,86	%45.27	%3.77
01-03-2023	31-03-2023	\$ 5.771.959,00	\$ 229.926,07	\$ 7.270.807,93	%46.26	%3.86
01-04-2023	30-04-2023	\$ 5.771.959,00	\$ 226.501,20	\$ 7.497.309,13	%47.09	%3.92
01-05-2023	31-05-2023	\$ 5.771.959,00	\$ 225.701,08	\$ 7.723.010,21	%45.41	%3.78
01-06-2023	30-06-2023	\$ 5.771.959,00	\$ 214.716,90	\$ 7.937.727,11	%44.64	%3.72

DESDE	HASTA	CAPITAL	INTERES MES	INTERES ACUMULADO	TASA BASE	TASA
01-07-2023	31-07-2023	\$ 5.771.959,00	\$ 218.891,93	\$ 8.156.619,04	%44.04	%3.67
01-08-2023	31-08-2023	\$ 5.771.959,00	\$ 214.369,03	\$ 8.370.988,07	%43.13	%3.59
01-09-2023	30-09-2023	\$ 5.771.959,00	\$ 202.259,10	\$ 8.573.247,17	%42.05	%3.5
01-10-2023	31-10-2023	\$ 5.771.959,00	\$ 197.817,82	\$ 8.771.064,99	%39.8	%3.32
01-11-2023	30-11-2023	\$ 5.771.959,00	\$ 184.125,60	\$ 8.955.190,59	%38.28	%3.19
01-12-2023	31-12-2023	\$ 5.771.959,00	\$ 180.662,40	\$ 9.135.852,99	%37.56	%3.13

Resumen: Se adeuda un valor total de **(15828489) QUINCE MILLONES OCHOCIENTOS VEINTIOCHO MIL CUATROCIENTOS OCHENTA Y NUEVE** Pesos (M/cte)

Días de Mora:	1805
Capital:	\$ 5.771.959
Interés Moratorio:	\$ 9.135.853
Interés Corriente:	\$ 895.011
Otros Conceptos:	\$ 25.666
Total:	\$ 15.828.489



Obligación : 725051010279662 - # Pagare : 051016100018031

DESDE	HASTA	CAPITAL	INTERES MES	INTERES ACUMULADO	TASA BASE	TASA
06-08-2018	31-08-2018	\$ 1.809.219,00	\$ 39.082,16	\$ 39.082,16	%29.91	%2.49
01-09-2018	30-09-2018	\$ 1.809.219,00	\$ 44.808,30	\$ 83.890,46	%29.72	%2.48
01-10-2018	31-10-2018	\$ 1.809.219,00	\$ 45.881,24	\$ 129.771,70	%29.45	%2.45
01-11-2018	30-11-2018	\$ 1.809.219,00	\$ 44.084,70	\$ 173.856,40	%29.24	%2.44
01-12-2018	31-12-2018	\$ 1.809.219,00	\$ 45.335,95	\$ 219.192,35	%29.1	%2.43
01-01-2019	31-01-2019	\$ 1.809.219,00	\$ 44.775,16	\$ 263.967,51	%28.74	%2.4
01-02-2019	28-02-2019	\$ 1.809.219,00	\$ 41.581,96	\$ 305.549,47	%29.55	%2.46
01-03-2019	31-03-2019	\$ 1.809.219,00	\$ 45.273,64	\$ 350.823,11	%29.06	%2.42
01-04-2019	30-04-2019	\$ 1.809.219,00	\$ 43.692,60	\$ 394.515,71	%28.98	%2.42
01-05-2019	31-05-2019	\$ 1.809.219,00	\$ 45.195,83	\$ 439.711,54	%29.01	%2.42
01-06-2019	30-06-2019	\$ 1.809.219,00	\$ 43.647,30	\$ 483.358,84	%28.95	%2.41
01-07-2019	31-07-2019	\$ 1.809.219,00	\$ 45.055,71	\$ 528.414,55	%28.92	%2.41
01-08-2019	31-08-2019	\$ 1.809.219,00	\$ 45.149,02	\$ 573.563,57	%28.98	%2.42
01-09-2019	30-09-2019	\$ 1.809.219,00	\$ 43.692,60	\$ 617.256,17	%28.98	%2.42
01-10-2019	31-10-2019	\$ 1.809.219,00	\$ 44.635,04	\$ 661.891,21	%28.65	%2.39
01-11-2019	30-11-2019	\$ 1.809.219,00	\$ 43.044,30	\$ 704.935,51	%28.55	%2.38
01-12-2019	31-12-2019	\$ 1.809.219,00	\$ 44.198,87	\$ 749.134,38	%28.37	%2.36
01-01-2020	31-01-2020	\$ 1.809.219,00	\$ 43.871,51	\$ 793.005,89	%28.16	%2.35
01-02-2020	29-02-2020	\$ 1.809.219,00	\$ 41.667,78	\$ 834.673,67	%28.59	%2.38
01-03-2020	31-03-2020	\$ 1.809.219,00	\$ 44.292,18	\$ 878.965,85	%28.43	%2.37
01-04-2020	30-04-2020	\$ 1.809.219,00	\$ 42.275,40	\$ 921.241,25	%28.04	%2.34
01-05-2020	31-05-2020	\$ 1.809.219,00	\$ 42.516,19	\$ 963.757,44	%27.29	%2.27
01-06-2020	30-06-2020	\$ 1.809.219,00	\$ 40.978,80	\$ 1.004.736,24	%27.18	%2.27
01-07-2020	31-07-2020	\$ 1.809.219,00	\$ 42.344,76	\$ 1.047.081,00	%27.18	%2.27
01-08-2020	31-08-2020	\$ 1.809.219,00	\$ 42.749,93	\$ 1.089.830,93	%27.44	%2.29
01-09-2020	30-09-2020	\$ 1.809.219,00	\$ 41.506,50	\$ 1.131.337,43	%27.53	%2.29



DESDE	HASTA	CAPITAL	INTERES MES	INTERES ACUMULADO	TASA BASE	TASA
01-10-2020	31-10-2020	\$ 1.809.219,00	\$ 42.282,45	\$ 1.173.619,88	%27.14	%2.26
01-11-2020	30-11-2020	\$ 1.809.219,00	\$ 40.345,50	\$ 1.213.965,38	%26.76	%2.23
01-12-2020	31-12-2020	\$ 1.809.219,00	\$ 40.802,51	\$ 1.254.767,89	%26.19	%2.18
01-01-2021	31-01-2021	\$ 1.809.219,00	\$ 40.475,15	\$ 1.295.243,04	%25.98	%2.17
01-02-2021	28-02-2021	\$ 1.809.219,00	\$ 37.022,72	\$ 1.332.265,76	%26.31	%2.19
01-03-2021	31-03-2021	\$ 1.809.219,00	\$ 40.693,39	\$ 1.372.959,15	%26.12	%2.18
01-04-2021	30-04-2021	\$ 1.809.219,00	\$ 39.154,50	\$ 1.412.113,65	%25.97	%2.16
01-05-2021	31-05-2021	\$ 1.809.219,00	\$ 40.241,41	\$ 1.452.355,06	%25.83	%2.15
01-06-2021	30-06-2021	\$ 1.809.219,00	\$ 38.928,30	\$ 1.491.283,36	%25.82	%2.15
01-07-2021	31-07-2021	\$ 1.809.219,00	\$ 40.148,10	\$ 1.531.431,46	%25.77	%2.15
01-08-2021	31-08-2021	\$ 1.809.219,00	\$ 40.288,22	\$ 1.571.719,68	%25.86	%2.16
01-09-2021	30-09-2021	\$ 1.809.219,00	\$ 38.883,00	\$ 1.610.602,68	%25.79	%2.15
01-10-2021	31-10-2021	\$ 1.809.219,00	\$ 39.914,36	\$ 1.650.517,04	%25.62	%2.14
01-11-2021	30-11-2021	\$ 1.809.219,00	\$ 39.064,20	\$ 1.689.581,24	%25.91	%2.16
01-12-2021	31-12-2021	\$ 1.809.219,00	\$ 40.802,51	\$ 1.730.383,75	%26.19	%2.18
01-01-2022	31-01-2022	\$ 1.809.219,00	\$ 41.269,68	\$ 1.771.653,43	%26.49	%2.21
01-02-2022	28-02-2022	\$ 1.809.219,00	\$ 38.626,84	\$ 1.810.280,27	%27.45	%2.29
01-03-2022	31-03-2022	\$ 1.809.219,00	\$ 43.170,60	\$ 1.853.450,87	%27.71	%2.31
01-04-2022	30-04-2022	\$ 1.809.219,00	\$ 43.089,60	\$ 1.896.540,47	%28.58	%2.38
01-05-2022	31-05-2022	\$ 1.809.219,00	\$ 46.068,17	\$ 1.942.608,64	%29.57	%2.46
01-06-2022	30-06-2022	\$ 1.809.219,00	\$ 46.135,20	\$ 1.988.743,84	%30.6	%2.55
01-07-2022	31-07-2022	\$ 1.809.219,00	\$ 49.729,27	\$ 2.038.473,11	%31.92	%2.66
01-08-2022	31-08-2022	\$ 1.809.219,00	\$ 51.910,43	\$ 2.090.383,54	%33.32	%2.78
01-09-2022	30-09-2022	\$ 1.809.219,00	\$ 53.145,90	\$ 2.143.529,44	%35.25	%2.94
01-10-2022	31-10-2022	\$ 1.809.219,00	\$ 57.518,95	\$ 2.201.048,39	%36.92	%3.08
01-11-2022	30-11-2022	\$ 1.809.219,00	\$ 58.302,00	\$ 2.259.350,39	%38.67	%3.22
01-12-2022	31-12-2022	\$ 1.809.219,00	\$ 64.592,22	\$ 2.323.942,61	%41.46	%3.46
01-01-2023	31-01-2023	\$ 1.809.219,00	\$ 67.396,48	\$ 2.391.339,09	%43.26	%3.61



DESDE	HASTA	CAPITAL	INTERES MES	INTERES ACUMULADO	TASA BASE	TASA
01-02-2023	28-02-2023	\$ 1.809.219,00	\$ 63.702,52	\$ 2.455.041,61	%45.27	%3.77
01-03-2023	31-03-2023	\$ 1.809.219,00	\$ 72.070,35	\$ 2.527.111,96	%46.26	%3.86
01-04-2023	30-04-2023	\$ 1.809.219,00	\$ 70.996,80	\$ 2.598.108,76	%47.09	%3.92
01-05-2023	31-05-2023	\$ 1.809.219,00	\$ 70.746,03	\$ 2.668.854,79	%45.41	%3.78
01-06-2023	30-06-2023	\$ 1.809.219,00	\$ 67.302,90	\$ 2.736.157,69	%44.64	%3.72
01-07-2023	31-07-2023	\$ 1.809.219,00	\$ 68.611,68	\$ 2.804.769,37	%44.04	%3.67
01-08-2023	31-08-2023	\$ 1.809.219,00	\$ 67.193,74	\$ 2.871.963,11	%43.13	%3.59
01-09-2023	30-09-2023	\$ 1.809.219,00	\$ 63.398,10	\$ 2.935.361,21	%42.05	%3.5
01-10-2023	31-10-2023	\$ 1.809.219,00	\$ 62.005,89	\$ 2.997.367,10	%39.8	%3.32
01-11-2023	30-11-2023	\$ 1.809.219,00	\$ 57.714,00	\$ 3.055.081,10	%38.28	%3.19
01-12-2023	31-12-2023	\$ 1.809.219,00	\$ 56.628,60	\$ 3.111.709,70	%37.56	%3.13

Resumen: Se adeuda un valor total de **(5090568) CINCO MILLONES NOVENTA MIL QUINIENTOS SESENTA Y OCHO** Pesos (M/cte)

Días de Mora:

1973

Capital:

\$ 1.809.219

Interés Moratorio:

\$ 12.247.563

Interés Corriente:

\$ 167.008

Otros Conceptos:

\$ 2.631

Total:

\$ 5.090.568

