

**PROCESO 2006-00097**

Albertina Aguirre <ma3abogadosasociados@yahoo.com>

Jue 10/11/2022 4:44 PM

Para: Juzgado 03 Civil Circuito - Boyacá - Sogamoso <j03cctosogamoso@cendoj.ramajudicial.gov.co>

Señor,

Dr. SANTIAGO ANDRES SALAZAR HERNANDEZ

**JUEZ TERCERO CIVIL DEL CIRCUITO DE SOGAMOSO**

E. S. D.

**RADICADO:** 2006-00097 (J.1.C.C.)  
**PROCESO:** EJECUTIVO (Ord. SIMULACION)  
**DEMANDANTE:** ROQUE GONZALEZ Y JOSE DEL CARMEN ESPITIA  
**DEMANDADO:** GONZALO TORRES HERNANDEZ Y OTRO

Cordial saludo,

Allego memorial en formato PDF para su conocimiento y tramite.

Atentamente,

**MARIA ALBERTINA AGUIRRE ALVARADO**  
**ABOGADA – ESPECIALISTA EN DERECHO PÚBLICO Y PENAL**  
**UNIVERSIDAD NACIONAL DE COLOMBIA**  
**Carrera 10 No. 8-94 2 piso Sogamoso, Boyacá**  
**Tel. 3124476545 - (8) 7705421**



PROFESIONALES Y SERVICIOS  
MARÍA ALBERTINA AGUIRRE ALVARADO  
ESPECIALISTA EN DERECHO PÚBLICO Y PENAL  
UNIVERSIDAD NACIONAL DE COLOMBIA

Señor,  
Dr. SANTIAGO ANDRES SALAZAR HERNANDEZ  
**JUEZ TERCERO CIVIL DEL CIRCUITO DE SOGAMOSO**  
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**MARÍA ALBERTINA AGUIRRE ALVARADO**, mayor de edad, vecina y domiciliada en el Municipio de Sogamoso, Abogada en ejercicio, identificada con la C.C. N°. 41.679.792 de Bogotá y T. P. N°. 45.236 Del C. S. de la Jud., actuando como apoderada de la parte demandante, respetuosamente a su despacho allego **LIQUIDACIÓN DEL CRÉDITO**, teniendo en cuenta el auto de 31 de octubre de 2022, así:

| LIQUIDACIÓN DE CREDITO |    |      |       |         |               |                 |
|------------------------|----|------|-------|---------|---------------|-----------------|
| MES                    | N  | DIAS | IBC   | IBC+1/2 | INTERES MORA  | CAPITAL         |
| feb-11                 | 12 | 14   | 15,61 | 1,95125 | \$ 37.283,54  | \$ 4.094.468,00 |
| mar-11                 | 12 | 30   | 15,61 | 1,95125 | \$ 79.893,31  | \$ 4.094.468,00 |
| abr-11                 | 12 | 30   | 17,69 | 2,21125 | \$ 90.538,92  | \$ 4.094.468,00 |
| may-11                 | 12 | 30   | 17,69 | 2,21125 | \$ 90.538,92  | \$ 4.094.468,00 |
| jun-11                 | 12 | 30   | 17,69 | 2,21125 | \$ 90.538,92  | \$ 4.094.468,00 |
| jul-11                 | 12 | 30   | 18,63 | 2,32875 | \$ 95.349,92  | \$ 4.094.468,00 |
| ago-11                 | 12 | 30   | 18,63 | 2,32875 | \$ 95.349,92  | \$ 4.094.468,00 |
| sep-11                 | 12 | 30   | 18,63 | 2,32875 | \$ 95.349,92  | \$ 4.094.468,00 |
| oct-11                 | 12 | 30   | 19,39 | 2,42375 | \$ 99.239,67  | \$ 4.094.468,00 |
| nov-11                 | 12 | 30   | 19,39 | 2,42375 | \$ 99.239,67  | \$ 4.094.468,00 |
| dic-11                 | 12 | 30   | 19,39 | 2,42375 | \$ 99.239,67  | \$ 4.094.468,00 |
| ene-12                 | 12 | 30   | 19,92 | 2,49    | \$ 101.952,25 | \$ 4.094.468,00 |
| feb-12                 | 12 | 30   | 19,92 | 2,49    | \$ 101.952,25 | \$ 4.094.468,00 |
| mar-12                 | 12 | 30   | 19,92 | 2,49    | \$ 101.952,25 | \$ 4.094.468,00 |
| abr-12                 | 12 | 30   | 20,52 | 2,565   | \$ 105.023,10 | \$ 4.094.468,00 |
| may-12                 | 12 | 30   | 20,52 | 2,565   | \$ 105.023,10 | \$ 4.094.468,00 |
| jun-12                 | 12 | 30   | 20,52 | 2,565   | \$ 105.023,10 | \$ 4.094.468,00 |
| jul-12                 | 12 | 30   | 20,86 | 2,6075  | \$ 106.763,25 | \$ 4.094.468,00 |
| ago-12                 | 12 | 30   | 20,86 | 2,6075  | \$ 106.763,25 | \$ 4.094.468,00 |
| sep-12                 | 12 | 30   | 20,86 | 2,6075  | \$ 106.763,25 | \$ 4.094.468,00 |
| oct-12                 | 12 | 30   | 20,89 | 2,61125 | \$ 106.916,80 | \$ 4.094.468,00 |
| nov-12                 | 12 | 30   | 20,89 | 2,61125 | \$ 106.916,80 | \$ 4.094.468,00 |
| dic-12                 | 12 | 30   | 20,89 | 2,61125 | \$ 106.916,80 | \$ 4.094.468,00 |
| ene-13                 | 12 | 30   | 20,75 | 2,59375 | \$ 106.200,26 | \$ 4.094.468,00 |
| feb-13                 | 12 | 30   | 20,75 | 2,59375 | \$ 106.200,26 | \$ 4.094.468,00 |
| mar-13                 | 12 | 30   | 20,75 | 2,59375 | \$ 106.200,26 | \$ 4.094.468,00 |
| abr-13                 | 12 | 30   | 20,83 | 2,60375 | \$ 106.609,71 | \$ 4.094.468,00 |
| may-13                 | 12 | 30   | 20,83 | 2,60375 | \$ 106.609,71 | \$ 4.094.468,00 |
| jun-13                 | 12 | 30   | 20,83 | 2,60375 | \$ 106.609,71 | \$ 4.094.468,00 |
| jul-13                 | 12 | 30   | 20,34 | 2,5425  | \$ 104.101,85 | \$ 4.094.468,00 |

|        |    |    |       |         |               |                 |
|--------|----|----|-------|---------|---------------|-----------------|
| ago-13 | 12 | 30 | 20,34 | 2,5425  | \$ 104.101,85 | \$ 4.094.468,00 |
| sep-13 | 12 | 30 | 20,34 | 2,5425  | \$ 104.101,85 | \$ 4.094.468,00 |
| oct-13 | 12 | 30 | 19,85 | 2,48125 | \$ 101.593,99 | \$ 4.094.468,00 |
| nov-13 | 12 | 30 | 19,85 | 2,48125 | \$ 101.593,99 | \$ 4.094.468,00 |
| dic-13 | 12 | 30 | 19,85 | 2,48125 | \$ 101.593,99 | \$ 4.094.468,00 |
| ene-14 | 12 | 30 | 19,65 | 2,45625 | \$ 100.570,37 | \$ 4.094.468,00 |
| feb-14 | 12 | 30 | 19,65 | 2,45625 | \$ 100.570,37 | \$ 4.094.468,00 |
| mar-14 | 12 | 30 | 19,65 | 2,45625 | \$ 100.570,37 | \$ 4.094.468,00 |
| abr-14 | 12 | 30 | 19,63 | 2,45375 | \$ 100.468,01 | \$ 4.094.468,00 |
| may-14 | 12 | 30 | 19,63 | 2,45375 | \$ 100.468,01 | \$ 4.094.468,00 |
| jun-14 | 12 | 30 | 19,63 | 2,45375 | \$ 100.468,01 | \$ 4.094.468,00 |
| jul-14 | 12 | 30 | 19,33 | 2,41625 | \$ 98.932,58  | \$ 4.094.468,00 |
| ago-14 | 12 | 30 | 19,33 | 2,41625 | \$ 98.932,58  | \$ 4.094.468,00 |
| sep-14 | 12 | 30 | 19,33 | 2,41625 | \$ 98.932,58  | \$ 4.094.468,00 |
| oct-14 | 12 | 30 | 19,17 | 2,39625 | \$ 98.113,69  | \$ 4.094.468,00 |
| nov-14 | 12 | 30 | 19,17 | 2,39625 | \$ 98.113,69  | \$ 4.094.468,00 |
| dic-14 | 12 | 30 | 19,17 | 2,39625 | \$ 98.113,69  | \$ 4.094.468,00 |
| ene-15 | 12 | 30 | 19,21 | 2,40125 | \$ 98.318,41  | \$ 4.094.468,00 |
| feb-15 | 12 | 30 | 19,21 | 2,40125 | \$ 98.318,41  | \$ 4.094.468,00 |
| mar-15 | 12 | 30 | 19,21 | 2,40125 | \$ 98.318,41  | \$ 4.094.468,00 |
| abr-15 | 12 | 30 | 19,37 | 2,42125 | \$ 99.137,31  | \$ 4.094.468,00 |
| may-15 | 12 | 30 | 19,37 | 2,42125 | \$ 99.137,31  | \$ 4.094.468,00 |
| jun-15 | 12 | 30 | 19,37 | 2,42125 | \$ 99.137,31  | \$ 4.094.468,00 |
| jul-15 | 12 | 30 | 19,26 | 2,4075  | \$ 98.574,32  | \$ 4.094.468,00 |
| ago-15 | 12 | 30 | 19,26 | 2,4075  | \$ 98.574,32  | \$ 4.094.468,00 |
| sep-15 | 12 | 30 | 19,26 | 2,4075  | \$ 98.574,32  | \$ 4.094.468,00 |
| oct-15 | 12 | 30 | 19,33 | 2,41625 | \$ 98.932,58  | \$ 4.094.468,00 |
| nov-15 | 12 | 30 | 19,33 | 2,41625 | \$ 98.932,58  | \$ 4.094.468,00 |
| dic-15 | 12 | 30 | 19,33 | 2,41625 | \$ 98.932,58  | \$ 4.094.468,00 |
| ene-16 | 12 | 30 | 19,68 | 2,46    | \$ 100.723,91 | \$ 4.094.468,00 |
| feb-16 | 12 | 30 | 19,68 | 2,46    | \$ 100.723,91 | \$ 4.094.468,00 |
| mar-16 | 12 | 30 | 19,68 | 2,46    | \$ 100.723,91 | \$ 4.094.468,00 |
| abr-16 | 12 | 30 | 20,54 | 2,5675  | \$ 105.125,47 | \$ 4.094.468,00 |
| may-16 | 12 | 30 | 20,54 | 2,5675  | \$ 105.125,47 | \$ 4.094.468,00 |
| jun-16 | 12 | 30 | 20,54 | 2,5675  | \$ 105.125,47 | \$ 4.094.468,00 |
| jul-16 | 12 | 30 | 21,34 | 2,6675  | \$ 109.219,93 | \$ 4.094.468,00 |
| ago-16 | 12 | 30 | 21,34 | 2,6675  | \$ 109.219,93 | \$ 4.094.468,00 |
| sep-16 | 12 | 30 | 21,34 | 2,6675  | \$ 109.219,93 | \$ 4.094.468,00 |
| oct-16 | 12 | 30 | 21,99 | 2,74875 | \$ 112.546,69 | \$ 4.094.468,00 |
| nov-16 | 12 | 30 | 21,99 | 2,74875 | \$ 112.546,69 | \$ 4.094.468,00 |
| dic-16 | 12 | 30 | 21,99 | 2,74875 | \$ 112.546,69 | \$ 4.094.468,00 |
| ene-17 | 12 | 30 | 22,34 | 2,7925  | \$ 114.338,02 | \$ 4.094.468,00 |
| feb-17 | 12 | 30 | 22,34 | 2,7925  | \$ 114.338,02 | \$ 4.094.468,00 |
| mar-17 | 12 | 30 | 22,34 | 2,7925  | \$ 114.338,02 | \$ 4.094.468,00 |
| abr-17 | 12 | 30 | 22,33 | 2,79125 | \$ 114.286,84 | \$ 4.094.468,00 |
| may-17 | 12 | 30 | 22,33 | 2,79125 | \$ 114.286,84 | \$ 4.094.468,00 |
| jun-17 | 12 | 30 | 22,33 | 2,79125 | \$ 114.286,84 | \$ 4.094.468,00 |
| jul-17 | 12 | 30 | 21,98 | 2,7475  | \$ 112.495,51 | \$ 4.094.468,00 |
| ago-17 | 12 | 30 | 21,98 | 2,7475  | \$ 112.495,51 | \$ 4.094.468,00 |
| sep-17 | 12 | 30 | 21,48 | 2,685   | \$ 109.936,47 | \$ 4.094.468,00 |
| oct-17 | 12 | 30 | 21,15 | 2,64375 | \$ 108.247,50 | \$ 4.094.468,00 |
| nov-17 | 12 | 30 | 20,96 | 2,62    | \$ 107.275,06 | \$ 4.094.468,00 |

|        |    |    |       |         |               |                 |
|--------|----|----|-------|---------|---------------|-----------------|
| dic-17 | 12 | 30 | 20,77 | 2,59625 | \$ 106.302,63 | \$ 4.094.468,00 |
| ene-18 | 12 | 30 | 20,69 | 2,58625 | \$ 105.893,18 | \$ 4.094.468,00 |
| feb-18 | 12 | 30 | 21,01 | 2,62625 | \$ 107.530,97 | \$ 4.094.468,00 |
| mar-18 | 12 | 30 | 20,68 | 2,585   | \$ 105.842,00 | \$ 4.094.468,00 |
| abr-18 | 12 | 30 | 20,48 | 2,56    | \$ 104.818,38 | \$ 4.094.468,00 |
| may-18 | 12 | 30 | 20,44 | 2,555   | \$ 104.613,66 | \$ 4.094.468,00 |
| jun-18 | 12 | 30 | 20,28 | 2,535   | \$ 103.794,76 | \$ 4.094.468,00 |
| jul-18 | 12 | 30 | 20,03 | 2,50375 | \$ 102.515,24 | \$ 4.094.468,00 |
| ago-18 | 12 | 30 | 19,94 | 2,4925  | \$ 102.054,61 | \$ 4.094.468,00 |
| sep-18 | 12 | 30 | 19,81 | 2,47625 | \$ 101.389,26 | \$ 4.094.468,00 |
| oct-18 | 12 | 30 | 19,63 | 2,45375 | \$ 100.468,01 | \$ 4.094.468,00 |
| nov-18 | 12 | 30 | 19,49 | 2,43625 | \$ 99.751,48  | \$ 4.094.468,00 |
| dic-18 | 12 | 30 | 19,4  | 2,425   | \$ 99.290,85  | \$ 4.094.468,00 |
| ene-19 | 12 | 30 | 19,16 | 2,395   | \$ 98.062,51  | \$ 4.094.468,00 |
| feb-19 | 12 | 30 | 19,7  | 2,4625  | \$ 100.826,27 | \$ 4.094.468,00 |
| mar-19 | 12 | 30 | 19,37 | 2,42125 | \$ 99.137,31  | \$ 4.094.468,00 |
| abr-19 | 12 | 30 | 19,32 | 2,415   | \$ 98.881,40  | \$ 4.094.468,00 |
| may-19 | 12 | 30 | 19,34 | 2,4175  | \$ 98.983,76  | \$ 4.094.468,00 |
| jun-19 | 12 | 30 | 19,3  | 2,4125  | \$ 98.779,04  | \$ 4.094.468,00 |
| jul-19 | 12 | 30 | 19,28 | 2,41    | \$ 98.676,68  | \$ 4.094.468,00 |
| ago-19 | 12 | 30 | 19,32 | 2,415   | \$ 98.881,40  | \$ 4.094.468,00 |
| sep-19 | 12 | 30 | 19,32 | 2,415   | \$ 98.881,40  | \$ 4.094.468,00 |
| oct-19 | 12 | 30 | 19,1  | 2,3875  | \$ 97.755,42  | \$ 4.094.468,00 |
| nov-19 | 12 | 30 | 19,03 | 2,37875 | \$ 97.397,16  | \$ 4.094.468,00 |
| dic-19 | 12 | 30 | 18,91 | 2,36375 | \$ 96.782,99  | \$ 4.094.468,00 |
| ene-20 | 12 | 30 | 18,77 | 2,34625 | \$ 96.066,46  | \$ 4.094.468,00 |
| feb-20 | 12 | 30 | 19,06 | 2,3825  | \$ 97.550,70  | \$ 4.094.468,00 |
| mar-20 | 12 | 30 | 18,95 | 2,36875 | \$ 96.987,71  | \$ 4.094.468,00 |
| abr-20 | 12 | 30 | 18,69 | 2,33625 | \$ 95.657,01  | \$ 4.094.468,00 |
| may-20 | 12 | 30 | 18,19 | 2,27375 | \$ 93.097,97  | \$ 4.094.468,00 |
| jun-20 | 12 | 30 | 18,12 | 2,265   | \$ 92.739,70  | \$ 4.094.468,00 |
| jul-20 | 12 | 9  | 18,12 | 2,265   | \$ 92.739,70  | \$ 4.094.468,00 |
| ago-20 | 12 | 30 | 18,29 | 2,28625 | \$ 93.609,77  | \$ 4.094.468,00 |
| sep-20 | 12 | 30 | 18,35 | 2,29375 | \$ 93.916,86  | \$ 4.094.468,00 |
| oct-20 | 12 | 15 | 18,09 | 2,26125 | \$ 46.293,08  | \$ 4.094.468,00 |
| nov-20 | 12 | 30 | 17,84 | 2,23    | \$ 91.306,64  | \$ 4.094.468,00 |
| dic-20 | 12 | 30 | 17,46 | 2,1825  | \$ 89.361,76  | \$ 4.094.468,00 |
| ene-21 | 12 | 30 | 17,32 | 2,165   | \$ 88.645,23  | \$ 4.094.468,00 |
| feb-21 | 12 | 30 | 17,54 | 2,1925  | \$ 89.771,21  | \$ 4.094.468,00 |
| mar-21 | 12 | 30 | 17,41 | 2,17625 | \$ 89.105,86  | \$ 4.094.468,00 |
| abr-21 | 12 | 30 | 17,31 | 2,16375 | \$ 88.594,05  | \$ 4.094.468,00 |
| may-21 | 12 | 30 | 17,22 | 2,1525  | \$ 88.133,42  | \$ 4.094.468,00 |
| jun-21 | 12 | 30 | 17,21 | 2,15125 | \$ 88.082,24  | \$ 4.094.468,00 |
| jul-21 | 12 | 30 | 17,18 | 2,1475  | \$ 87.928,70  | \$ 4.094.468,00 |
| ago-21 | 12 | 30 | 17,24 | 2,155   | \$ 88.235,79  | \$ 4.094.468,00 |
| sep-21 | 12 | 30 | 17,19 | 2,14875 | \$ 87.979,88  | \$ 4.094.468,00 |
| oct-21 | 12 | 30 | 17,08 | 2,135   | \$ 42.700,00  | \$ 4.094.468,00 |
| dic-21 | 12 | 30 | 17,46 | 2,1825  | \$ 89.361,76  | \$ 4.094.468,00 |
| ene-22 | 12 | 30 | 17,66 | 2,2075  | \$ 90.385,38  | \$ 4.094.468,00 |

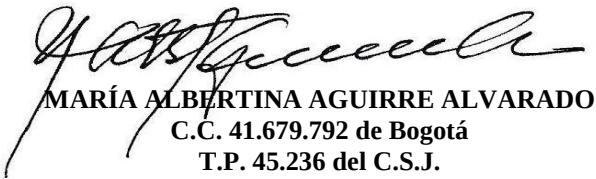
|                   |    |    |       |            |                  |                 |
|-------------------|----|----|-------|------------|------------------|-----------------|
| feb-22            | 12 | 30 | 18,30 | 1,525      | \$ 62.440,64     | \$ 4.094.468,00 |
| mar-22            | 12 | 30 | 18,47 | 1,53916667 | \$ 63.020,69     | \$ 4.094.468,00 |
| abr-22            | 12 | 30 | 18,47 | 2,30875    | \$ 94.531,03     | \$ 4.094.468,00 |
| may-22            | 12 | 30 | 19,05 | 2,38125    | \$ 97.499,52     | \$ 4.094.468,00 |
| jun-22            | 12 | 30 | 19,71 | 2,46375    | \$ 100.877,46    | \$ 4.094.468,00 |
| jul-22            | 12 | 30 | 21,28 | 2,66       | \$ 108.912,85    | \$ 4.094.468,00 |
| ago-22            | 12 | 24 | 22,21 | 2,77625    | \$ 90.938,13     | \$ 4.094.468,00 |
| sep-22            | 12 | 30 | 23,50 | 2,9375     | \$ 120.275,00    | \$ 4.094.468,00 |
| oct-22            | 12 | 21 | 24,61 | 3,07625    | \$ 54.580,96     | \$ 4.094.468,00 |
| nov-22            | 12 | 10 | 25,78 | 3,2225     | \$ 57.175,83     | \$ 4.094.468,00 |
| TOTAL LIQUIDACION |    |    |       |            | \$ 13.864.173,84 |                 |

| CONCEPTO       | VALOR           |
|----------------|-----------------|
| CAPITAL        | \$4.094.468,00  |
| INTERESES MORA | \$13.864.173,00 |
| COSTAS         | \$450.000,00    |
| TOTAL          | \$18.408.641,00 |

La actualización total del crédito de 14 de febrero de 2021 al 10 de noviembre de 2022 es de **DIECIOCHO MILLONES CUATROCEINTOS OCHOMIL SEISIENTOS CUARENTA Y UN PESOS** (\$18.408.641) MCTE.

Del señor Juez,

Atentamente,

  
**MARÍA ALBERTINA AGUIRRE ALVARADO**  
C.C. 41.679.792 de Bogotá  
T.P. 45.236 del C.S.J.