

Juzgado 2 Civil del Circuito Armenia.Q. Rad.: 2020-101

andres heno <henaoidarraga@yahoo.com>

Jue 14/07/2022 7:36

Para: Centro Servicios Judiciales Civil Familia - Armenia - Quindio <cserjudcfarm@cendoj.ramajudicial.gov.co>; Juzgado 02 Civil Circuito - Quindio - Armenia <j02ccctoarm@cendoj.ramajudicial.gov.co>

CC: agroholandesa@hotmail.com <agroholandesa@hotmail.com>

Buenos días.

Adjunto memorial dirigido al juzgado y expediente de la referencia.

Cordialmente,

ANDRES HENAO
Abogado.

Señor
JUEZ 2 CIVIL DEL CIRCUITO
Armenia. Quindío.

Ref: Proceso Ejecutivo para la efectividad de la garantía real N° 2020 – 101
Demandante: BANCO AGRARIO DE COLOMBIA S.A.
Demandado: AGRO HOLANDESA S.A.S.

ANDRES ALEJANDRO HENAO IDARRAGA, mayor, vecino de Armenia.Q., Identificado con la Cédula de Ciudadanía N° 89.005.349 expedida en Armenia.Q., Abogado en ejercicio con Tarjeta Profesional N° 106.826 del Consejo Superior de la Judicatura, obrando en nombre y representación de la parte actora dentro del proceso de la referencia, por medio del presente escrito respetuosamente presento ante su Despacho liquidación del crédito de la siguiente forma:

				\$			
CAPITAL				119,999,925			
FECHA inicio liq							
fecha final liq				CAPITAL 119,999,925.00			
Periodo intereses de mora				Int. mora Ef. Anual	Int. Mora tasa Mensual	intereses período	intereses acumulados
dia	mes	año	N° días				
1	7	2019					
31	7	2019	31	28.92	2.41	\$ 2,988,398.13	\$ 2,988,398.13
1	8	2019					
31	8	2019	31	28.98	2.415	\$ 2,994,598.13	\$ 5,982,996.26
1	9	2019					
30	9	2019	30	28.98	2.415	\$ 2,897,998.19	\$ 8,880,994.45
1	10	2019					
31	10	2019	31	28.98	2.415	\$ 2,994,598.13	\$ 11,875,592.58
1	11	2019					
30	11	2019	30	28.55	2.3791667	\$ 2,854,998.22	\$ 14,730,590.79
1	12	2019					
30	12	2019	31	28.37	2.3641667	\$ 2,931,564.83	\$ 17,662,155.63
1	1	2020					
30	1	2020	30	28.16	2.3466667	\$ 2,815,998.24	\$ 20,478,153.87
1	2	2020					
29	2	2020	29	28.59	2.3825	\$ 2,763,698.27	\$ 23,241,852.14
1	3	2020					
31	3	2020	31	28.43	2.3691667	\$ 2,937,764.83	\$ 26,179,616.97

1	4	2020					
30	4	2020	30	28.04	2.3366667	\$ 2,803,998.25	\$ 28,983,615.22
1	5	2020					
31	5	2020	31	27.29	2.2741667	\$ 2,819,964.90	\$ 31,803,580.12
1	6	2020					
30	6	2020	30	27.18	2.265	\$ 2,717,998.30	\$ 34,521,578.42
1	7	2020					
31	7	2020	31	27.18	2.265	\$ 2,808,598.24	\$ 37,330,176.67
1	8	2020					
31	8	2020	31	27.44	2.2866667	\$ 2,835,464.89	\$ 40,165,641.56
1	9	2020					
30	9	2020	30	27.53	2.2941667	\$ 2,752,998.28	\$ 42,918,639.84
1	10	2020					
31	10	2020	31	27.14	2.2616667	\$ 2,804,464.91	\$ 45,723,104.76
1	11	2020					
30	11	2020	30	26.76	2.23	\$ 2,675,998.33	\$ 48,399,103.08
1	12	2020					
31	12	2020	31	26.19	2.1825	\$ 2,706,298.31	\$ 51,105,401.39
1	1	2021					
31	1	2021	31	25.98	2.165	\$ 2,684,598.32	\$ 53,789,999.71
1	2	2021					
28	2	2021	28	26.31	2.1925	\$ 2,455,598.47	\$ 56,245,598.18
1	3	2021					
31	3	2021	31	26.12	2.1766667	\$ 2,699,064.98	\$ 58,944,663.16
1	4	2021					
30	4	2021	30	25.97	2.1641667	\$ 2,596,998.38	\$ 61,541,661.54
1	5	2021					
31	5	2021	31	25.83	2.1525	\$ 2,669,098.33	\$ 64,210,759.87
1	6	2021					
30	6	2021	30	25.82	2.1516667	\$ 2,581,998.39	\$ 66,792,758.25
1	7	2021					
31	7	2021	31	25.77	2.1475	\$ 2,662,898.34	\$ 69,455,656.59
1	8	2021					
31	8	2021	31	25.86	2.155	\$ 2,672,198.33	\$ 72,127,854.92
1	9	2021					
30	9	2021	30	25.79	2.1491667	\$ 2,578,998.39	\$ 74,706,853.31
1	10	2021					
31	10	2021	31	25.62	2.135	\$ 2,647,398.35	\$ 77,354,251.65
1	11	2021					
30	11	2021	30	25.91	2.1591667	\$ 2,590,998.38	\$ 79,945,250.03
1	12	2021					
31	12	2021	31	26.19	2.1825	\$ 2,706,298.31	\$ 82,651,548.34
1	1	2022					
31	1	2022	31	26.49	2.2075	\$ 2,737,298.29	\$ 85,388,846.63
1	2	2022					
28	2	2022	31	27.7	2.3083333	\$ 2,862,331.54	\$ 88,251,178.18
1	3	2022					
31	3	2022	31	27.7	2.3083333	\$ 2,862,331.54	\$ 91,113,509.72
1	4	2022					
30	4	2022	30	28.58	2.3816667	\$ 2,857,998.21	\$ 93,971,507.93
1	5	2022					
31	5	2022	31	29.56	2.4633333	\$ 3,054,531.42	\$ 97,026,039.36
1	6	2022					

30	6	2022	31	30.6	2.55	\$ 3,161,998.02	\$ 100,188,037.38
1	7	2022					
14	7	2022	14	31.92	2.66	\$ 1,489,599.07	\$ 101,677,636.45

OTROS	
CONCEPTOS	19052862
INTERESES	
PLAZO	17335099
SUB TOTAL	\$ 258,065,522.45

CAPITAL \$ 71,987,409

FECHA inicio liq

fecha final liq

CAPITAL 71,987,409.00

Periodo intereses de mora				Int. mora Ef.	Int. Mora tasa	intereses	intereses
dia	mes	año	Nº días	Anual	Mensual	período	acumulados
30	12	2019					
31	12	2019	1	28.37	2.3641667	\$ 56,730.08	\$ 56,730.08
1	1	2020					
30	1	2020	30	28.16	2.3466667	\$ 1,689,304.53	\$ 1,746,034.61
1	2	2020					
29	2	2020	29	28.59	2.3825	\$ 1,657,930.02	\$ 3,403,964.63
1	3	2020					
31	3	2020	31	28.43	2.3691667	\$ 1,762,351.75	\$ 5,166,316.38
1	4	2020					
30	4	2020	30	28.04	2.3366667	\$ 1,682,105.79	\$ 6,848,422.17
1	5	2020					
31	5	2020	31	27.29	2.2741667	\$ 1,691,684.11	\$ 8,540,106.29
1	6	2020					
30	6	2020	30	27.18	2.265	\$ 1,630,514.81	\$ 10,170,621.10
1	7	2020					
31	7	2020	31	27.18	2.265	\$ 1,684,865.31	\$ 11,855,486.41
1	8	2020					
31	8	2020	31	27.44	2.2866667	\$ 1,700,982.49	\$ 13,556,468.90
1	9	2020					
30	9	2020	30	27.53	2.2941667	\$ 1,651,511.14	\$ 15,207,980.04
1	10	2020					
31	10	2020	31	27.14	2.2616667	\$ 1,682,385.74	\$ 16,890,365.78
1	11	2020					
30	11	2020	30	26.76	2.23	\$ 1,605,319.22	\$ 18,495,685.00
1	12	2020					
31	12	2020	31	26.19	2.1825	\$ 1,623,496.04	\$ 20,119,181.04
1	1	2021					
31	1	2021	31	25.98	2.165	\$ 1,610,478.32	\$ 21,729,659.36
1	2	2021					
28	2	2021	28	26.31	2.1925	\$ 1,473,102.35	\$ 23,202,761.71
1	3	2021					
31	3	2021	31	26.12	2.1766667	\$ 1,619,156.80	\$ 24,821,918.51
1	4	2021					
30	4	2021	30	25.97	2.1641667	\$ 1,557,927.51	\$ 26,379,846.02
1	5	2021					
31	5	2021	31	25.83	2.1525	\$ 1,601,179.94	\$ 27,981,025.96
1	6	2021					

30	6	2021	30	25.82	2.1516667	\$ 1,548,929.08	\$ 29,529,955.05
1	7	2021					
31	7	2021	31	25.77	2.1475	\$ 1,597,460.60	\$ 31,127,415.64
1	8	2021					
31	8	2021	31	25.86	2.155	\$ 1,603,039.62	\$ 32,730,455.26
1	9	2021					
30	9	2021	30	25.79	2.1491667	\$ 1,547,129.40	\$ 34,277,584.66
1	10	2021					
31	10	2021	31	25.62	2.135	\$ 1,588,162.22	\$ 35,865,746.88
1	11	2021					
30	11	2021	30	25.91	2.1591667	\$ 1,554,328.14	\$ 37,420,075.02
1	12	2021					
31	12	2021	31	26.19	2.1825	\$ 1,623,496.04	\$ 39,043,571.06
1	1	2022					
31	1	2022	31	26.49	2.2075	\$ 1,642,092.79	\$ 40,685,663.85
1	2	2022					
28	2	2022	31	27.7	2.3083333	\$ 1,717,099.67	\$ 42,402,763.52
1	3	2022					
31	3	2022	31	27.7	2.3083333	\$ 1,717,099.67	\$ 44,119,863.19
1	4	2022					
30	4	2022	30	28.58	2.3816667	\$ 1,714,500.12	\$ 45,834,363.31
1	5	2022					
31	5	2022	31	29.56	2.4633333	\$ 1,832,399.50	\$ 47,666,762.82
1	6	2022					
30	6	2022	31	30.6	2.55	\$ 1,896,868.23	\$ 49,563,631.04
1	7	2022					
14	7	2022	14	31.92	2.66	\$ 893,603.70	\$ 50,457,234.75

OTROS

CONCEPTOS6049375

INTERESES

PLAZO17335099

SUB TOTAL\$ 145,829,117.75

CAPITAL\$ 6,905,648

FECHA inicio liq

fecha final liq

CAPITAL6,905,648.00

Periodo intereses de mora				Int. mora Ef. Anual	Int. Mora tasa Mensual	intereses período	intereses acumulados
dia	mes	año	Nº días				
29	12	2019					
31	12	2019	2	28.37	2.3641667	\$ 10,884.07	\$ 10,884.07
1	1	2020					
30	1	2020	30	28.16	2.3466667	\$ 162,052.54	\$ 172,936.61
1	2	2020					
29	2	2020	29	28.59	2.3825	\$ 159,042.83	\$ 331,979.44
1	3	2020					
31	3	2020	31	28.43	2.3691667	\$ 169,059.85	\$ 501,039.29
1	4	2020					
30	4	2020	30	28.04	2.3366667	\$ 161,361.97	\$ 662,401.27
1	5	2020					
31	5	2020	31	27.29	2.2741667	\$ 162,280.81	\$ 824,682.08
1	6	2020					
30	6	2020	30	27.18	2.265	\$ 156,412.93	\$ 981,095.00

1	7	2020					
31	7	2020	31	27.18	2.265	\$ 161,626.69	\$ 1,142,721.69
1	8	2020					
31	8	2020	31	27.44	2.2866667	\$ 163,172.79	\$ 1,305,894.48
1	9	2020					
30	9	2020	30	27.53	2.2941667	\$ 158,427.07	\$ 1,464,321.56
1	10	2020					
31	10	2020	31	27.14	2.2616667	\$ 161,388.83	\$ 1,625,710.39
1	11	2020					
30	11	2020	30	26.76	2.23	\$ 153,995.95	\$ 1,779,706.34
1	12	2020					
31	12	2020	31	26.19	2.1825	\$ 155,739.63	\$ 1,935,445.96
1	1	2021					
31	1	2021	31	25.98	2.165	\$ 154,490.86	\$ 2,089,936.82
1	2	2021					
28	2	2021	28	26.31	2.1925	\$ 141,312.58	\$ 2,231,249.40
1	3	2021					
31	3	2021	31	26.12	2.1766667	\$ 155,323.37	\$ 2,386,572.77
1	4	2021					
30	4	2021	30	25.97	2.1641667	\$ 149,449.73	\$ 2,536,022.50
1	5	2021					
31	5	2021	31	25.83	2.1525	\$ 153,598.88	\$ 2,689,621.37
1	6	2021					
30	6	2021	30	25.82	2.1516667	\$ 148,586.53	\$ 2,838,207.90
1	7	2021					
31	7	2021	31	25.77	2.1475	\$ 153,242.08	\$ 2,991,449.98
1	8	2021					
31	8	2021	31	25.86	2.155	\$ 153,777.27	\$ 3,145,227.26
1	9	2021					
30	9	2021	30	25.79	2.1491667	\$ 148,413.88	\$ 3,293,641.14
1	10	2021					
31	10	2021	31	25.62	2.135	\$ 152,350.10	\$ 3,445,991.24
1	11	2021					
30	11	2021	30	25.91	2.1591667	\$ 149,104.45	\$ 3,595,095.69
1	12	2021					
31	12	2021	31	26.19	2.1825	\$ 155,739.63	\$ 3,750,835.32
1	1	2022					
31	1	2022	31	26.49	2.2075	\$ 157,523.59	\$ 3,908,358.91
1	2	2022					
28	2	2022	31	27.7	2.3083333	\$ 164,718.89	\$ 4,073,077.79
1	3	2022					
31	3	2022	31	27.7	2.3083333	\$ 164,718.89	\$ 4,237,796.68
1	4	2022					
30	4	2022	30	28.58	2.3816667	\$ 164,469.52	\$ 4,402,266.20
1	5	2022					
31	5	2022	31	29.56	2.4633333	\$ 175,779.43	\$ 4,578,045.63
1	6	2022					
30	6	2022	31	30.6	2.55	\$ 181,963.82	\$ 4,760,009.46
1	7	2022					
14	7	2022	14	31.92	2.66	\$ 85,722.11	\$ 4,845,731.57

OTROS
CONCEPTOS
INTERESES

247888
553054

PLAZO	
SUB TOTAL	\$ 12,552,321.57
TOTAL	\$ 416,446,961.77

Del señor Juez, respetuosamente



ANDRES ALEJANDRO HENAO IDARRAGA
C.C. 89.005.349 Armenia.Q.
T.P. 106.826 C.S.J.