



Somos su mejor aliado

Señor
JUEZ (35) CIVIL MUNICIPAL DE BOGOTÁ D.C.
E. S. D.

REREFERENCIA : PROCESO EJECUTIVO SINGULAR
ASUNTO : OBJECCIÓN LIQUIDACIÓN DEL CREDITO
DEMANDANTE : COOPERATIVA FINANCIERA JOHN. F KENNEDY
DEMANDADO : CLAUDIA PATRICIA GUERRERO RIVERA
: CHRISTIAN ANIBAL MARTINEZ HERRERA
: GLADYS ARAMINTA RIVERA TORRES
: KENNETH MENDOZA OSORIO
RADICADO : 2018-00345

En mi calidad de endosatario al cobro de la entidad demandante dentro del proceso de la referencia, dentro del término de ley, de conformidad al artículo 446 del C.G.P, me dirijo al señor Juez con el fin interponer **OBJECCIÓN** a la liquidación de crédito presentada por la demandada **CLAUDIA PATRICIA GUERRERO RIVERA**, en tanto en ella se incurrió en los siguientes errores:

1. En la liquidación del crédito aportada por la demandada, se procedió a liquidar los intereses moratorios desde el 14 de diciembre de 2013 y así consecutivamente los días 14 de cada mes, siendo lo correcto, los días 15 de cada mes, a partir del 15 de diciembre de 2013.
2. En la liquidación del crédito aportada por la demandada, para la fecha 14 de abril 2015 se incluyó la suma de \$312.204, suma que no corresponde a la cuota de dicha mensualidad, pues para esa fecha la suma de capital adeudada era \$258.354.
3. En la liquidación del crédito aportada por la demandada, se omitió incluir la cuota del capital adeudado para el mes de abril de 2016, que asciende a la suma de \$322.424.

Como fundamento de la objeción propuesta me permito allegar una nueva liquidación, realizada conforme al mandamiento de pago, que asciende a la suma de **TREINTA MILLONES SETECIENTOS CUARENTA Y CINCO MIL SETECIENTOS VENTITRES PESOS CON DIEZ CVS (30.745.723,10).**

Anexos: Liquidación de crédito.

Atentamente,

PAULA ANDREA BEDOYA CARDONA
C.C No 43.639.171 de Medellín.
T.P. No 114.733 del C. S de la Judicatura.

NIT. 900362081-4
Tel: 448 14 94
Ci 67A # 48 D 53
(Sector Éxito de Colombia)
Medellín - Colombia

info@expertosabogados.com
www.expertosabogados.com



JUZGADO 35 CIVIL MUNICIPAL DE BOGOTÁ D.C.

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201800345

Pagaré Nro.0404255

[illegible]

Vigencia				Brio, Cte.	Máxima Mensual	Tasa	Inserte en esta columna capitales, cuotas u otros	Capital Liquidable	días	Intereses en esta Liquidación	Abonos		Saldo de Intereses	Saldo de Capital más Intereses
Desde	Hasta	Efec. Anual	Autorizada	Aplicable							Valor	Folio		
15-dic-13	31-dic-13	19,85%	2,20%	2,196%		\$ 200,724,00	0,00		16	2,350,55			3,994,920,55	4,195,644,55
1-ene-14	14-ene-14	19,65%	2,18%	2,176%		200,724,00			14	2,038,27			3,996,958,82	4,197,682,82
15-ene-14	31-ene-14	19,65%	2,18%	2,176%		\$ 203,934,00			16	4,696,16			4,001,654,97	4,406,312,97
1-feb-14	14-feb-14	19,65%	2,18%	2,176%		404,658,00			14	4,109,14			4,005,764,11	4,410,422,11
15-feb-14	28-feb-14	19,65%	2,18%	2,176%		\$ 207,174,00			16	7,100,46			4,012,864,57	4,624,666,57
1-mar-14	14-mar-14	19,65%	2,18%	2,176%		611,832,00			14	6,212,90			4,019,077,47	4,630,909,47
15-mar-14	31-mar-14	19,65%	2,18%	2,176%		\$ 210,474,00			16	9,543,06			4,028,620,54	4,850,926,54
1-abr-14	14-abr-14	19,63%	2,17%	2,174%		822,306,00			14	8,342,61			4,036,963,14	4,859,269,14
15-abr-14	30-abr-14	19,63%	2,17%	2,174%		\$ 213,804,00			16	12,013,41			4,048,976,55	5,085,086,55
1-may-14	14-may-14	19,63%	2,17%	2,174%		1,036,110,00			14	10,511,73			4,059,488,28	5,095,588,28
15-may-14	31-may-14	19,63%	2,17%	2,174%		\$ 217,194,00			16	14,531,71			4,074,324,00	5,320,324,00
1-jun-14	14-jun-14	19,63%	2,17%	2,174%		\$ 220,674,00			14	12,715,25			4,086,735,24	5,340,039,24
15-jun-14	30-jun-14	19,63%	2,17%	2,174%		1,473,978,00			16	17,090,37			4,103,825,61	5,577,803,61
1-jul-14	14-jul-14	19,33%	2,14%	2,144%		\$ 224,184,00			14	14,750,14			4,118,575,75	5,592,553,75
15-jul-14	31-jul-14	19,33%	2,14%	2,144%		1,698,162,00			16	19,421,21			4,137,996,96	5,836,158,96
1-ago-14	14-ago-14	19,33%	2,14%	2,144%		1,698,162,00			14	16,993,56			4,154,990,51	5,853,152,51
15-ago-14	31-ago-14	19,33%	2,14%	2,144%		\$ 227,724,00			16	22,025,60			4,177,016,11	6,102,902,11
1-sep-14	14-sep-14	19,33%	2,14%	2,144%		1,925,886,00			14	19,272,40			4,196,288,51	6,122,174,51
15-sep-14	30-sep-14	19,33%	2,14%	2,144%		\$ 231,354,00			16	24,671,50			4,220,960,01	6,378,200,01
1-oct-14	14-oct-14	19,17%	2,13%	2,129%		2,157,240,00			14	21,428,00			4,269,545,38	6,661,829,38
15-oct-14	31-oct-14	19,17%	2,13%	2,129%		\$ 235,044,00			16	27,157,37			4,293,308,08	6,685,552,08
1-nov-14	14-nov-14	19,17%	2,13%	2,129%		2,392,284,00			14	23,762,70			4,323,175,92	6,954,222,92
15-nov-14	30-nov-14	19,17%	2,13%	2,129%		\$ 238,764,00			16	29,867,84			4,349,310,28	6,980,358,28
1-dic-14	14-dic-14	19,17%	2,13%	2,129%		2,631,048,00			14	26,134,36			4,381,931,84	7,255,553,84
15-dic-14	31-dic-14	19,17%	2,13%	2,129%		\$ 242,574,00			16	32,621,56			4,410,528,88	7,284,150,88
1-ene-15	14-ene-15	19,21%	2,13%	2,132%		\$ 246,414,00			14	28,597,04			4,446,013,72	7,566,049,72
15-ene-15	31-ene-15	19,21%	2,13%	2,132%					16	35,484,85				

1-abr-20	30-abr-20	18,69%	2,08%	2,081%	11.103.394,00	30	231.039,26	17.634.466,76	28.737.860,76
1-may-20	31-may-20	18,19%	2,03%	2,031%	11.103.394,00	30	225.491,47	17.859.958,24	28.963.352,24
1-jun-20	30-jun-20	18,12%	2,02%	2,024%	11.103.394,00	30	224.712,39	18.084.670,63	29.188.064,63
1-jul-20	31-jul-20	18,12%	2,02%	2,024%	11.103.394,00	30	224.712,39	18.309.383,02	29.412.777,02
1-ago-20	31-ago-20	18,29%	2,04%	2,041%	11.103.394,00	30	226.603,42	18.535.986,45	29.639.380,45
1-sep-20	30-sep-20	18,35%	2,05%	2,047%	11.103.394,00	30	227.270,02	18.763.256,47	29.866.650,47
1-oct-20	31-oct-20	18,09%	2,02%	2,021%	11.103.394,00	30	224.378,32	18.987.634,79	30.091.028,79
1-nov-20	30-nov-20	17,84%	2,00%	1,996%	11.103.394,00	30	221.590,16	19.209.224,95	30.312.618,95
1-dic-20	31-dic-20	17,46%	1,96%	1,957%	11.103.394,00	30	217.337,65	19.426.562,60	30.529.956,60
1-ene-21	31-ene-21	17,32%	1,94%	1,943%	11.103.394,00	30	215.766,50	19.642.329,10	30.745.723,10
							15.649.759,10	0,00	19.642.329,10

SALDO DE CAPITAL	11.103.394,00
SALDO DE INTERESES MORATORIOS	19.642.329,10
TOTAL CAPITAL MAS INTERESES ADEUDADOS	30.745.723,10

1-feb-15	14-feb-15	19,21%	2,13%	2,132%	\$ 250,344,00	3,120,036,00	14	31,049,24	4,477,062,96	7,597,098,96
15-feb-15	28-feb-15	19,21%	2,13%	2,132%	\$ 250,344,00	3,370,380,00	16	38,332,06	4,515,395,02	7,885,775,02
1-mar-15	14-mar-15	19,21%	2,13%	2,132%	\$ 254,334,00	3,370,380,00	14	33,540,55	4,548,935,58	7,919,315,58
15-mar-15	31-mar-15	19,21%	2,13%	2,132%	\$ 254,334,00	3,624,714,00	16	41,224,66	4,590,160,24	8,214,874,24
1-abr-15	14-abr-15	19,37%	2,15%	2,148%	\$ 258,354,00	3,624,714,00	14	36,339,58	4,626,499,81	8,251,213,81
15-abr-15	30-abr-15	19,37%	2,15%	2,148%	\$ 258,354,00	3,883,068,00	16	44,491,09	4,670,990,91	8,554,058,91
1-may-15	14-may-15	19,37%	2,15%	2,148%	\$ 262,464,00	3,883,068,00	14	38,929,71	4,709,920,61	8,592,988,61
15-may-15	31-may-15	19,37%	2,15%	2,148%	\$ 262,464,00	4,145,532,00	16	47,498,33	4,757,418,94	8,902,950,94
1-jun-15	14-jun-15	19,37%	2,15%	2,148%	\$ 266,634,00	4,412,166,00	16	50,553,35	4,798,979,98	8,944,511,98
15-jun-15	30-jun-15	19,37%	2,14%	2,137%	\$ 270,894,00	4,412,166,00	14	44,009,96	4,893,543,29	9,305,709,29
1-jul-15	14-jul-15	19,26%	2,14%	2,137%	\$ 270,894,00	4,683,060,00	16	53,385,19	4,946,928,48	9,629,988,48
15-jul-15	31-jul-15	19,26%	2,14%	2,137%	\$ 275,184,00	4,683,060,00	14	46,712,04	4,993,640,53	9,676,700,53
1-ago-15	14-ago-15	19,26%	2,14%	2,137%	\$ 275,184,00	4,958,244,00	16	56,522,19	5,050,162,71	10,008,406,71
15-ago-15	31-ago-15	19,26%	2,14%	2,137%	\$ 279,564,00	4,958,244,00	14	49,456,92	5,099,619,63	10,057,863,63
1-sep-15	14-sep-15	19,26%	2,14%	2,137%	\$ 279,564,00	5,237,808,00	16	59,709,12	5,159,328,75	10,397,136,75
15-sep-15	30-sep-15	19,33%	2,14%	2,144%	\$ 284,004,00	5,237,808,00	14	52,414,90	5,211,743,65	10,449,551,65
1-oct-15	14-oct-15	19,33%	2,14%	2,144%	\$ 284,004,00	5,521,812,00	16	63,150,78	5,274,894,43	10,796,706,43
15-oct-15	31-oct-15	19,33%	2,14%	2,144%	\$ 288,534,00	5,521,812,00	14	55,256,94	5,330,151,37	10,851,963,37
1-nov-15	14-nov-15	19,33%	2,14%	2,144%	\$ 288,534,00	5,810,346,00	16	66,450,63	5,396,602,00	11,206,948,00
15-nov-15	30-nov-15	19,33%	2,14%	2,144%	\$ 293,124,00	5,810,346,00	14	58,144,30	5,454,746,30	11,265,092,30
1-dic-15	14-dic-15	19,33%	2,14%	2,144%	\$ 293,124,00	6,103,470,00	16	62,062,51	5,524,549,28	11,628,019,28
15-dic-15	31-dic-15	19,68%	2,18%	2,179%	\$ 297,774,00	6,401,244,00	14	74,389,02	5,586,611,79	12,062,244,81
1-ene-16	14-ene-16	19,68%	2,18%	2,179%	\$ 302,514,00	6,401,244,00	16	65,090,39	5,726,091,21	12,127,335,21
15-ene-16	31-ene-16	19,68%	2,18%	2,179%	\$ 307,314,00	6,703,758,00	14	68,166,48	5,872,162,23	12,575,920,23
1-feb-16	14-feb-16	19,68%	2,18%	2,179%	\$ 312,204,00	7,011,072,00	16	81,475,85	6,027,691,61	13,038,763,61
15-feb-16	29-feb-16	19,68%	2,18%	2,179%	\$ 312,204,00	7,323,276,00	14	88,401,31	6,116,092,92	13,439,368,92
1-mar-16	14-mar-16	19,68%	2,18%	2,179%	\$ 317,184,00	7,323,276,00	16	74,053,53	6,285,674,20	13,926,134,20
15-mar-16	31-mar-16	20,54%	2,26%	2,263%	\$ 312,204,00	7,640,460,00	14	92,230,13	6,366,375,56	14,006,835,56
1-abr-16	14-abr-16	20,54%	2,26%	2,263%	\$ 312,204,00	7,962,884,00	16	86,999,85	6,462,497,76	14,425,381,76
15-abr-16	30-abr-16	20,54%	2,26%	2,263%	\$ 317,184,00	7,962,884,00	14	96,122,20	6,549,497,61	14,512,381,61
1-may-16	14-may-16	20,54%	2,26%	2,263%	\$ 322,424,00	8,290,238,00	16	103,515,90	6,653,013,50	14,943,251,50
15-may-16	31-may-16	20,54%	2,26%	2,263%	\$ 322,424,00	8,290,238,00	14	90,576,41	6,743,589,92	15,033,827,92
1-jun-16	14-jun-16	21,34%	2,34%	2,341%	\$ 327,354,00	8,622,782,00	16	107,668,20	6,851,258,12	15,474,040,12
15-jun-16	31-jun-16	21,34%	2,34%	2,341%	\$ 332,544,00	8,622,782,00	14	94,209,68	6,945,467,79	15,568,249,79
1-jul-16	14-jul-16	21,34%	2,34%	2,341%	\$ 337,824,00	8,960,606,00	16	111,886,43	7,057,354,23	16,017,960,23
15-jul-16	30-jul-16	21,34%	2,34%	2,341%	\$ 337,824,00	8,960,606,00	14	100,525,73	7,157,879,96	16,118,485,96
1-ago-16	14-ago-16	21,34%	2,34%	2,341%	\$ 343,194,00	9,303,800,00	16	104,375,90	7,277,166,69	16,580,966,69
15-ago-16	31-ago-16	21,34%	2,34%	2,341%	\$ 348,650,00	9,303,800,00	14	123,756,88	7,505,299,47	17,157,749,47
1-sep-16	14-sep-16	21,99%	2,40%	2,404%	\$ 348,650,00	9,652,450,00	16			
15-sep-16	30-sep-16	21,99%	2,40%	2,404%	\$ 348,650,00	9,652,450,00	14			
1-oct-16	14-oct-16	21,99%	2,40%	2,404%	\$ 348,650,00	9,652,450,00	16			
15-oct-16	31-oct-16	21,99%	2,40%	2,404%	\$ 348,650,00	9,652,450,00	14			
1-nov-16	14-nov-16	21,99%	2,40%	2,404%	\$ 348,650,00	9,652,450,00	16			
15-nov-16	30-nov-16	21,99%	2,40%	2,404%	\$ 348,650,00	9,652,450,00	14			

1-dic-16	14-dic-16	21,99%	2,40%	2,404%	9,652,450,00	14	108,287,27	7,613,586,74	17,266,036,74
15-dic-16	31-dic-16	21,99%	2,40%	2,404%	10,006,654,00	16	128,298,23	7,741,884,97	17,748,538,97
1-ene-17	14-ene-17	22,34%	2,44%	2,438%	10,006,654,00	14	113,831,33	7,855,716,30	17,862,370,30
15-ene-17	31-ene-17	22,34%	2,44%	2,438%	10,366,498,00	16	134,771,15	7,990,487,46	18,356,985,46
1-feb-17	14-feb-17	22,34%	2,44%	2,438%	10,366,498,00	14	117,924,76	8,108,412,21	18,474,910,21
15-feb-17	28-feb-17	22,34%	2,44%	2,438%	10,732,042,00	16	139,523,46	8,247,935,67	18,979,977,67
1-mar-17	14-mar-17	22,34%	2,44%	2,438%	10,732,042,00	14	122,083,03	8,370,018,70	19,102,060,70
15-mar-17	31-mar-17	22,34%	2,44%	2,438%	11,103,394,00	16	144,351,27	8,514,369,97	19,617,763,97
1-abr-17	30-abr-17	22,33%	2,44%	2,437%	11,103,394,00	30	270,552,14	8,784,922,12	19,888,316,12
1-may-17	31-may-17	22,33%	2,44%	2,437%	11,103,394,00	30	270,552,14	9,055,474,26	20,158,868,26
1-jun-17	30-jun-17	22,33%	2,44%	2,437%	11,103,394,00	30	270,552,14	9,326,026,41	20,429,420,41
1-jul-17	31-jul-17	21,98%	2,40%	2,403%	11,103,394,00	30	266,817,85	9,592,844,26	20,696,238,26
1-ago-17	31-ago-17	21,98%	2,40%	2,403%	11,103,394,00	30	261,459,64	9,859,662,11	20,963,056,11
1-sep-17	30-sep-17	21,48%	2,35%	2,355%	11,103,394,00	30	257,907,93	10,121,121,74	21,224,515,74
1-oct-17	31-oct-17	21,15%	2,32%	2,323%	11,103,394,00	30	255,857,45	10,379,029,67	21,482,423,67
1-nov-17	30-nov-17	20,96%	2,30%	2,304%	11,103,394,00	30	253,802,90	10,634,887,13	21,738,281,13
1-dic-17	31-dic-17	20,77%	2,29%	2,286%	11,103,394,00	30	252,936,60	10,888,690,03	21,992,084,03
1-ene-18	31-ene-18	20,68%	2,28%	2,278%	11,103,394,00	30	252,936,60	11,141,626,63	22,245,020,63
1-feb-18	28-feb-18	21,01%	2,31%	2,309%	11,103,394,00	30	256,397,45	11,398,024,07	22,501,418,07
1-mar-18	31-mar-18	20,68%	2,28%	2,277%	11,103,394,00	30	252,828,26	11,650,852,33	22,754,246,33
1-abr-18	30-abr-18	20,48%	2,26%	2,257%	11,103,394,00	30	250,659,10	11,901,511,43	23,004,905,43
1-may-18	31-may-18	20,44%	2,25%	2,254%	11,103,394,00	30	250,224,72	12,151,736,14	23,255,130,14
1-jun-18	30-jun-18	20,28%	2,24%	2,238%	11,103,394,00	30	248,485,36	12,400,221,51	23,503,615,51
1-jul-18	31-jul-18	20,03%	2,21%	2,213%	11,103,394,00	30	245,761,74	12,645,983,25	23,749,377,25
1-ago-18	31-ago-18	19,94%	2,20%	2,205%	11,103,394,00	30	244,779,48	12,890,762,72	23,994,156,72
1-sep-18	30-sep-18	19,81%	2,19%	2,192%	11,103,394,00	30	243,358,99	13,134,121,72	24,237,515,72
1-oct-18	31-oct-18	19,63%	2,17%	2,174%	11,103,394,00	30	241,388,94	13,375,510,66	24,478,904,66
1-nov-18	30-nov-18	19,49%	2,16%	2,160%	11,103,394,00	30	239,854,07	13,615,364,72	24,718,758,72
1-dic-18	31-dic-18	19,40%	2,15%	2,151%	11,103,394,00	30	238,866,16	13,854,230,88	24,957,624,88
1-ene-19	31-ene-19	19,16%	2,13%	2,128%	11,103,394,00	30	236,227,09	14,090,457,97	25,193,851,97
1-feb-19	28-feb-19	19,70%	2,18%	2,181%	11,103,394,00	30	242,155,52	14,332,613,49	25,436,007,49
1-mar-19	31-mar-19	19,37%	2,15%	2,148%	11,103,394,00	30	238,536,64	14,571,150,13	25,674,544,13
1-abr-19	30-abr-19	19,32%	2,14%	2,143%	11,103,394,00	30	237,987,22	14,809,137,34	25,912,531,34
1-may-19	31-may-19	19,34%	2,15%	2,145%	11,103,394,00	30	238,207,02	15,047,344,37	26,150,738,37
1-jun-19	30-jun-19	19,30%	2,14%	2,141%	11,103,394,00	30	237,767,37	15,285,111,73	26,388,505,73
1-jul-19	31-jul-19	19,28%	2,14%	2,139%	11,103,394,00	30	237,547,47	15,522,659,20	26,626,053,20
1-ago-19	31-ago-19	19,32%	2,14%	2,143%	11,103,394,00	30	237,987,22	15,760,646,41	26,864,040,41
1-sep-19	30-sep-19	19,32%	2,14%	2,143%	11,103,394,00	30	235,566,27	15,998,633,63	27,102,027,63
1-oct-19	31-oct-19	19,10%	2,12%	2,122%	11,103,394,00	30	234,794,77	16,234,199,90	27,337,593,90
1-nov-19	30-nov-19	19,03%	2,11%	2,115%	11,103,394,00	30	233,470,86	16,468,994,67	27,572,388,67
1-dic-19	31-dic-19	18,91%	2,10%	2,103%	11,103,394,00	30	231,924,14	16,702,465,52	27,805,859,52
1-ene-20	31-ene-20	18,77%	2,09%	2,089%	11,103,394,00	30	235,125,48	16,934,389,67	28,037,783,67
1-feb-20	29-feb-20	19,06%	2,12%	2,118%	11,103,394,00	30	233,912,35	17,169,515,15	28,272,909,15
1-mar-20	31-mar-20	18,95%	2,11%	2,107%	11,103,394,00	30		17,403,427,50	28,506,821,50