

**RADICACION MEMORIAL PROCESO NO. 2019-1004 DE BANCO PICHINCHA VS ARTURO NEIRA GUEVARA**

RAMIRO PACANCHIQUE <rpmabogado@gmail.com>

Lun 28/03/2022 15:38

Para: Juzgado 11 Pequeñas Causas Competencia Multiple - Bogotá - Bogotá D.C.  
<j11pqccmbta@cendoj.ramajudicial.gov.co>

Respetados Señores,

Adjunto y envío memorial con solicitud, para su debido trámite y conocimiento.

Gracias

**Atentamente,**

**Ramiro Pacanchique Moreno**  
**CC. 80.417.255**  
**TP. 86.755**  
**RPM ABOGADO S.A.S**  
**PBX 2183494 - Cel 3152426333**  
**Calle 85 No. 19 A -25 Oficina 402 A**  
**Bogotá D.C. - Colombia**

**RPM ABOGADOS S.A.S.**

**3152426333**

**Calle 85 No. 19 A -25 Oficina 402 A – Teléfono 2183494**

**rpmabogado@gmail.com**

**Bogotá DC.**

SEÑOR

JUEZ 11 DE PEQUEÑAS CAUSAS Y COMPETENCIA MÚLTIPLE DE BOGOTÁ  
D.C.

E. \_\_\_\_\_ S. \_\_\_\_\_ D. \_\_\_\_\_

REF. PROCESO EJECUTIVO DE BANCO PICHINCHA S.A. EN CONTRA DE  
ARTURO NEIRA GUEVARA

PROCESO No. 2019-01004

**RAMIRO PACANCHIQUE MORENO**, mayor de edad y vecino de Bogotá, identificado con la Cédula de Ciudadanía No. 80.417.255 de Bogotá, abogado titulado en ejercicio portador de la Tarjeta Profesional No. 86.755 expedida por el Consejo Superior de la Judicatura, en mi calidad de Apoderado Judicial del **BANCO PICHINCHA S.A.** en el asunto de la referencia, mediante el presente escrito solicito al mediante el presente escrito me permito remitir Liquidación del Crédito actualizada, de acuerdo a lo establecido en el artículo 446 del CGP, para su trámite de aprobación.

Tener en cuenta que al día 28 de marzo del año 2022, la obligación asciende a la siguiente suma:

|                         |    |                      |
|-------------------------|----|----------------------|
| CAPITAL                 | \$ | 11.203.274.00        |
| INTERESES DE MORA       | \$ | 8.558.934.00         |
| INTERESES<br>CORRIENTES | \$ | 0.00                 |
| <b>TOTAL</b>            | \$ | <b>19.762.208.00</b> |

Se anexan liquidación de intereses de mora

Del señor Juez,

  
**RAMIRO PACANCHIQUE MORENO**  
CC 80.417.255  
T.P 86.755 DEL C.S.J

**INTERESES DE MORA**

| DESDE      | HASTA      | TASA  | 1/2 INT. | PERIODO | DIAS | CUOTA         | CAPITAL       | INTERES    | ABONO | TOTAL INTERESES | SALDO         |
|------------|------------|-------|----------|---------|------|---------------|---------------|------------|-------|-----------------|---------------|
| 26/02/2019 | 28/02/2019 | 19,7  | 9,85     | 2,18%   | 3    | \$ 11.203,274 | \$ 11.203,274 | \$ 24,433  | \$ -  | 24,433          | \$ 11.227,707 |
| 1/03/2019  | 30/03/2019 | 19,37 | 9,685    | 2,15%   | 31   | \$ -          | \$ 11.203,274 | \$ 248,705 | \$ -  | 273,139         | \$ 11.476,413 |
| 1/04/2019  | 30/04/2019 | 19,32 | 9,66     | 2,14%   | 30   | \$ -          | \$ 11.203,274 | \$ 240,128 | \$ -  | 513,267         | \$ 11.716,541 |
| 1/05/2019  | 31/05/2019 | 19,34 | 9,67     | 2,15%   | 31   | \$ -          | \$ 11.203,274 | \$ 248,361 | \$ -  | 761,628         | \$ 11.964,902 |
| 1/06/2019  | 30/06/2019 | 19,3  | 9,65     | 2,14%   | 30   | \$ -          | \$ 11.203,274 | \$ 239,906 | \$ -  | 1.001,534       | \$ 12.204,808 |
| 1/07/2019  | 31/07/2019 | 19,28 | 9,64     | 2,14%   | 31   | \$ -          | \$ 11.203,274 | \$ 247,674 | \$ -  | 1.249,208       | \$ 12.452,482 |
| 1/08/2019  | 31/08/2019 | 19,32 | 9,66     | 2,14%   | 31   | \$ -          | \$ 11.203,274 | \$ 248,132 | \$ -  | 1.497,340       | \$ 12.700,614 |
| 1/09/2019  | 30/09/2019 | 19,32 | 9,66     | 2,14%   | 30   | \$ -          | \$ 11.203,274 | \$ 240,128 | \$ -  | 1.737,468       | \$ 12.940,742 |
| 1/10/2019  | 31/10/2019 | 19,1  | 9,55     | 2,12%   | 31   | \$ -          | \$ 11.203,274 | \$ 245,608 | \$ -  | 1.983,076       | \$ 13.186,350 |
| 1/11/2019  | 30/11/2019 | 19,03 | 9,515    | 2,11%   | 30   | \$ -          | \$ 11.203,274 | \$ 236,907 | \$ -  | 2.219,983       | \$ 13.423,257 |
| 1/12/2019  | 31/12/2019 | 18,91 | 9,455    | 2,10%   | 31   | \$ -          | \$ 11.203,274 | \$ 243,423 | \$ -  | 2.463,407       | \$ 13.666,681 |
| 1/01/2020  | 31/01/2020 | 18,77 | 9,385    | 2,09%   | 31   | \$ -          | \$ 11.203,274 | \$ 241,811 | \$ -  | 2.705,217       | \$ 13.908,491 |
| 1/02/2020  | 29/02/2020 | 19,06 | 9,53     | 2,12%   | 29   | \$ -          | \$ 11.203,274 | \$ 229,333 | \$ -  | 2.934,550       | \$ 14.137,824 |
| 1/03/2020  | 31/03/2020 | 18,95 | 9,475    | 2,11%   | 31   | \$ -          | \$ 11.203,274 | \$ 243,884 | \$ -  | 3.178,434       | \$ 14.381,708 |
| 1/04/2020  | 30/04/2020 | 18,69 | 9,345    | 2,08%   | 30   | \$ -          | \$ 11.203,274 | \$ 233,118 | \$ -  | 3.411,551       | \$ 14.614,825 |
| 1/05/2020  | 31/05/2020 | 18,19 | 9,095    | 2,03%   | 31   | \$ -          | \$ 11.203,274 | \$ 235,104 | \$ -  | 3.646,655       | \$ 14.849,929 |
| 1/06/2020  | 30/06/2020 | 18,12 | 9,06     | 2,02%   | 30   | \$ -          | \$ 11.203,274 | \$ 226,734 | \$ -  | 3.873,389       | \$ 15.076,663 |
| 1/07/2020  | 31/07/2020 | 18,12 | 9,06     | 2,02%   | 31   | \$ -          | \$ 11.203,274 | \$ 234,292 | \$ -  | 4.107,680       | \$ 15.310,954 |
| 1/08/2020  | 30/08/2020 | 18,29 | 9,145    | 2,04%   | 31   | \$ -          | \$ 11.203,274 | \$ 236,263 | \$ -  | 4.343,944       | \$ 15.547,218 |
| 1/09/2020  | 30/09/2020 | 18,35 | 9,175    | 2,05%   | 30   | \$ -          | \$ 11.203,274 | \$ 229,314 | \$ -  | 4.573,258       | \$ 15.776,532 |
| 1/10/2020  | 31/10/2020 | 18,09 | 9,045    | 2,02%   | 31   | \$ -          | \$ 11.203,274 | \$ 233,943 | \$ -  | 4.807,201       | \$ 16.010,475 |
| 1/11/2020  | 30/11/2020 | 17,84 | 8,92     | 2,00%   | 30   | \$ -          | \$ 11.203,274 | \$ 223,583 | \$ -  | 5.030,785       | \$ 16.234,059 |
| 1/12/2020  | 31/12/2020 | 17,46 | 8,73     | 1,96%   | 31   | \$ -          | \$ 11.203,274 | \$ 226,602 | \$ -  | 5.257,387       | \$ 16.460,661 |
| 1/01/2021  | 31/01/2021 | 17,32 | 8,66     | 1,94%   | 31   | \$ -          | \$ 11.203,274 | \$ 224,964 | \$ -  | 5.482,352       | \$ 16.685,626 |
| 1/02/2021  | 28/02/2021 | 17,54 | 8,77     | 1,97%   | 28   | \$ -          | \$ 11.203,274 | \$ 205,518 | \$ -  | 5.687,869       | \$ 16.891,143 |
| 1/03/2021  | 31/03/2021 | 17,41 | 8,705    | 1,95%   | 31   | \$ -          | \$ 11.203,274 | \$ 226,018 | \$ -  | 5.913,887       | \$ 17.117,161 |
| 1/04/2021  | 31/04/21   | 17,31 | 8,655    | 1,94%   | 30   | \$ -          | \$ 11.203,274 | \$ 217,594 | \$ -  | 6.131,481       | \$ 17.334,755 |
| 1/05/2021  | 31/05/2021 | 17,22 | 8,61     | 1,93%   | 31   | \$ -          | \$ 11.203,274 | \$ 223,793 | \$ -  | 6.355,274       | \$ 17.558,548 |
| 1/06/2021  | 30/06/2021 | 17,21 | 8,605    | 1,93%   | 30   | \$ -          | \$ 11.203,274 | \$ 216,460 | \$ -  | 6.571,734       | \$ 17.775,008 |

|           |            |       |       |         |    |    |   |               |            |    |   |              |               |
|-----------|------------|-------|-------|---------|----|----|---|---------------|------------|----|---|--------------|---------------|
| 1/07/2021 | 31/07/2021 | 17,18 | 8,59  | 1,93%   | 31 | \$ | - | \$ 11.203,274 | \$ 223,324 | \$ | - | \$ 6.795,058 | \$ 17.998,332 |
| 1/08/2021 | 31/08/2021 | 17,24 | 8,62  | 1,94%   | 31 | \$ | - | \$ 11.203,274 | \$ 224,027 | \$ | - | \$ 7.019,085 | \$ 18.222,359 |
| 1/09/2021 | 31/09/21   | 17,19 | 8,595 | 1,93%   | 30 | \$ | - | \$ 11.203,274 | \$ 216,233 | \$ | - | \$ 7.235,318 | \$ 18.438,592 |
| 1/10/2021 | 31/10/2021 | 17,08 | 8,54  | 1,92%   | 31 | \$ | - | \$ 11.203,274 | \$ 222,150 | \$ | - | \$ 7.457,468 | \$ 18.660,742 |
| 1/11/2021 | 30/11/2021 | 17,27 | 8,635 | 1,94%   | 30 | \$ | - | \$ 11.203,274 | \$ 217,141 | \$ | - | \$ 7.674,609 | \$ 18.877,883 |
| 1/12/2021 | 31/12/2021 | 17,46 | 8,73  | 1,96%   | 31 | \$ | - | \$ 11.203,274 | \$ 226,602 | \$ | - | \$ 7.901,211 | \$ 19.104,485 |
| 1/01/2022 | 31/01/2022 | 17,66 | 8,83  | 1,98%   | 31 | \$ | - | \$ 11.203,274 | \$ 228,938 | \$ | - | \$ 8.130,150 | \$ 19.333,424 |
| 1/02/2022 | 28/02/2022 | 18,3  | 9,15  | 0,02042 | 28 | \$ | - | \$ 11.203,274 | \$ 213,504 | \$ | - | \$ 8.343,653 | \$ 19.546,927 |
| 1/03/2022 | 28/03/2022 | 18,47 | 9,235 | 0,02059 | 28 | \$ | - | \$ 11.203,274 | \$ 215,281 | \$ | - | \$ 8.558,934 | \$ 19.762,208 |