

memorial proceso 2020-981 allega liquidación del crédito

Navarro Torres Abogados <contacto@navarrotorresabogados.com>

Mar 23/11/2021 11:41

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

Señor:

JUEZ ONCE DE PEQUEÑAS CAUSAS Y COMPETENCIA MÚLTIPLE DE BOGOTÁ

j11pqccmbta@cendoj.ramajudicial.gov.co

E. S. D.

RADICADO: 2020-981

REFERENCIA: ALLEGA LIQUIDACIÓN DE CREDITO

PROCESO: EJECUTIVO SINGULAR MÍNIMA CUANTÍA

DEMANDANTE: EDIFICIO REYES III Y IV

DEMANDADOS: MARÍA DEL PILAR CARDONA RODRIGUEZ

JECKSON ORLANDO NAVARRO GARZÓN, identificado con la cédula de ciudadanía 91.538.904 de Bucaramanga, portador de la T.P. 218633 del Consejo Superior de la Judicatura, en mi calidad de apoderado de la parte demandante, me permito allegar liquidación del crédito:

MES	PERIODO INTERESES		CUOTA MES	SALDO CAPITAL	CAPITAL	INTERÉS MES	SALDO INTERÉS	INTERÉS TOTAL	%
Mar-16	01-Apr-16	30-Apr-16	\$53.505	0	53505	1211,0134	0	1211,013395	2,26%
Apr-16	01-May-16	31-May-16	\$135.000	53505	188505	4266,55602	1211,0134	5477,569419	2,26%
May-16	01-Jun-16	30-Jun-16	\$135.000	188505	323505	7322,09865	5477,56942	12799,66807	2,26%
Jun-16	01-Jul-16	31-Jul-16	\$135.000	323505	458505	10734,5885	12799,6681	23534,25658	2,34%
Jul-16	05-Aug-16	31-Aug-16	\$135.000	458505	593505	13895,229	23534,2566	37429,48553	2,34%
Aug-16	01-Sep-16	30-Sep-16	\$135.000	593505	728505	17055,8694	37429,4855	54485,35494	2,34%
Sep-16	01-Oct-16	31-Oct-16	\$135.000	728505	863505	20758,5934	54485,3549	75243,94835	2,40%
Oct-16	01-Nov-16	30-Nov-16	\$135.000	863505	998505	24003,983	75243,9484	99247,93132	2,40%
Nov-16	01-Dec-16	31-Dec-16	\$135.000	998505	1133505	27249,3725	99247,9313	126497,3039	2,40%
Dec-16	01-Jan-17	31-Jan-17	\$135.000	1133505	1268505	30921,3415	126497,304	157418,6454	2,44%
Jan-17	01-Feb-17	28-Feb-17	\$144.000	1268505	1412505	34431,5155	157418,645	191850,1608	2,44%
Feb-17	01-Mar-17	31-Mar-17	\$144.000	1412505	1556505	37941,6894	191850,161	229791,8502	2,44%
Mar-17	01-Apr-17	30-Apr-17	\$144.000	1556505	1700505	41435,5532	229791,85	271227,4035	2,44%
Apr-17	01-May-17	31-May-17	\$144.000	1700505	1844505	44944,346	271227,403	316171,7495	2,44%
May-17	01-Jun-17	30-Jun-17	\$144.000	1844505	1988505	48453,1388	316171,749	364624,8883	2,44%
Jun-17	01-Jul-17	31-Jul-17	\$144.000	1988505	2132505	51244,7277	364624,888	415869,616	2,40%

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Jul-17	01-Aug-17	31-Aug-17	\$144.000	2132505	2276505	54705,0904	415869,616	470574,7065	2,40%
Aug-17	01-Sep-17	30-Sep-17	\$144.000	2276505	2420505	56997,3789	470574,706	527572,0854	2,35%
Sep-17	01-Oct-17	31-Oct-17	\$144.000	2420505	2564505	59567,928	527572,085	587140,0134	2,32%
Oct-17	01-Nov-17	30-Nov-17	\$144.000	2564505	2708505	62412,5554	587140,013	649552,5688	2,30%
Nov-17	01-Dec-17	31-Dec-17	\$144.000	2708505	2852505	65202,9495	649552,569	714755,5183	2,29%
Dec-17	01-Jan-18	31-Jan-18	\$189.000	2852505	3041505	69285,8355	714755,518	784041,3538	2,28%
Jan-18	01-Feb-18	28-Feb-18	\$189.000	3041505	3230505	74598,2027	784041,354	858639,5565	2,31%
Feb-18	01-Mar-18	31-Mar-18	\$189.000	3230505	3419505	77863,3542	858639,557	936502,9107	2,28%
Mar-18	01-Apr-18	30-Apr-18	\$389.000*	3419505	3808505	85976,9921	936502,911	1022479,903	2,26%
Apr-18	01-May-18	31-May-18	\$189.000	3808505	3997505	90087,2787	1022479,9	1112567,182	2,25%
May-18	01-Jun-18	30-Jun-18	\$189.000	3997505	4186505	93690,7412	1112567,18	1206257,923	2,24%
Jun-18	01-Jul-18	31-Jul-18	\$189.000	4186505	4375505	96847,1201	1206257,92	1303105,043	2,21%
Jul-18	01-Aug-18	31-Aug-18	\$189.000	4375505	4564505	100626,632	1303105,04	1403731,675	2,20%
Aug-18	01-Sep-18	30-Sep-18	\$189.000	4564505	4753505	104185,098	1403731,67	1507916,773	2,19%
Sep-18	01-Oct-18	31-Oct-18	\$189.000	4753505	4942505	107450,572	1507916,77	1615367,345	2,17%
Oct-18	01-Nov-18	30-Nov-18	\$189.000	4942505	5131505	110850,1	1615367,34	1726217,445	2,16%
Nov-18	01-Dec-18	31-Dec-18	\$189.000	5131505	5320505	114459,468	1726217,45	1840676,914	2,15%
Dec-18	01-Jan-19	31-Jan-19	\$189.000	5320505	5509505	117352,457	1840676,91	1958029,37	2,13%
Jan-19	01-Feb-19	28-Feb-19	\$161.000	5509505	5670505	123617,009	1958029,37	2081646,379	2,18%
Feb-19	01-Mar-19	31-Mar-19	\$161.000	5670505	5831505	125377,358	2081646,38	2207023,737	2,15%
Mar-19	01-Apr-19	30-Apr-19	\$322.000**	5831505	6153505	131685,007	2207023,74	2338708,744	2,14%
Apr-19	01-May-19	31-May-19	\$161.000	6153505	6314505	135761,858	2338708,74	2474470,601	2,15%
May-19	01-Jun-19	30-Jun-19	\$161.000	6314505	6475505	138575,807	2474470,6	2613046,408	2,14%
Jun-19	01-Jul-19	31-Jul-19	\$161.000	6475505	6636505	142021,207	2613046,41	2755067,615	2,14%
Jul-19	01-Aug-19	31-Aug-19	\$161.000	6636505	6797505	145466,607	2755067,62	2900534,222	2,14%
Aug-19	01-Sep-19	30-Sep-19	\$161.000	6797505	6958505	148912,007	2900534,22	3049446,229	2,14%
Sep-19	01-Oct-19	31-Oct-19	\$161.000	6958505	7119505	150933,506	3049446,23	3200379,735	2,12%

Oct-19	01-Nov-19	30-Nov-19	\$161.000	7119505	7280505	153618,656	3200379,74	3353998,391	2,11%
Nov-19	01-Dec-19	31-Dec-19	\$161.000	7280505	7441505	156271,605	3353998,39	3510269,996	2,10%
Dec-19	01-Jan-20	31-Jan-20	\$161.000	7441505	7602505	158892,355	3510270	3669162,35	2,09%
Jan-20	01-Feb-20	28-Feb-20	\$178.000	7602505	7780505	164946,706	3669162,35	3834109,056	2,12%
Feb-20	01-Mar-20	31-Mar-20	\$178.000	7780505	7958505	159170,1	3834109,06	3993279,156	2,00%
Mar-20	01-Apr-20	15-Apr-20	\$178.000	7958505	8136505	169239,304	3993279,16	4162518,46	2,08%
Apr-20	01-May-20	31-May-20	\$178.000	8136505	8314505	168784,452	4162518,46	4331302,912	2,03%
May-20	01-Jun-20	30-Jun-20	\$178.000	8314505	8492505	171548,601	4331302,91	4502851,513	2,02%
Jun-20	01-Jul-20	31-Jul-20	\$178.000	8492505	8670505	175144,201	4502851,51	4677995,714	2,02%
Jul-20	01-Aug-20	31-Aug-20	\$178.000	8670505	8848505	180509,502	4677995,71	4858505,216	2,04%
Aug-20	01-Sep-20	30-Sep-20	\$178.000	8848505	9026505	185043,353	4858505,22	5043548,568	2,05%
Sep-20	01-Oct-20	31-Oct-20	\$178.000	9026505	9204505	185931,001	5043548,57	5229479,569	2,02%
Oct-20	01-Nov-20	30-Nov-20	\$178.000	9204505	9382505	186711,85	5229479,57	5416191,419	1,99%
Nov-20	01-Dec-20	30-Dec-20	\$178.000	9382505	9560505	186429,848	5416191,42	5602621,266	1,95%
Dec-20	01-Jan-21	31-Jan-21	\$178.000	9560505	9738505	188926,997	5602621,27	5791548,263	1,94%
Jan-21	01-Feb-21	28-Feb-21	\$184.000	9738505	9922505	194481,098	5791548,26	5986029,361	1,96%
Feb-21	01-Mar-21	31-Mar-21	\$184.000	9922505	10106505	197076,848	5986029,36	6183106,209	1,95%
Mar-21	01-Apr-21	30-Apr-21	\$184.000	10106505	10290505	199635,797	6183106,21	6382742,006	1,94%
Apr-21	01-May-21	31-May-21	\$184.000	10290505	10474505	202157,947	6382742,01	6584899,952	1,93%
May-21	01-Jun-21	30-Jun-21	\$184.000	10474505	10658505	205709,147	6584899,95	6790609,099	1,93%
Jun-21	01-Jul-21	31-Jul-21	\$184.000	10658505	10842505	209260,347	6790609,1	6999869,445	1,93%
Jul-21	01-Aug-21	31-Aug-21	\$184.000	10842505	11026505	213914,197	6999869,45	7213783,642	1,94%
Aug-21	01-Sep-21	30-Sep-21	\$184.000	11026505	11210505	216362,747	7213783,64	7430146,389	1,93%
Sep-21	01-Oct-21	31-Oct-21	\$184.000	11210505	11394505	218774,496	7430146,39	7648920,885	1,92%
Oct-21	01-Nov-21	23-Nov-21	\$184.000	11394505	11578505	172210,964	7648920,88	7821131,844	1,94%

*+ Cuota extraordinaria mar-18: \$200.000

**+ Sanción inasistencia asamblea mar-19: \$161.000

CAPITAL	\$11.578.505
INTERÉS	\$7.821.132

TOTAL	\$19.399.637
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Adjunto certificado adicional de deuda, donde consta el valor de las cuotas causadas después de la radicación de la demanda.

Atentamente,

JECKSON ORLANDO NAVARRO GARZÓN

C.C. 91.538.904 de Bucaramanga.

T. P: 218633 del C.S de la J.

Señor:
JUEZ ONCE DE PEQUEÑAS CAUSAS Y COMPETENCIA MÚLTIPLE DE BOGOTÁ
j11pqccmbta@cendoj.ramajudicial.gov.co
E. S. D.

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DEMANDANTE: EDIFICIO REYES III Y IV
DEMANDADOS: MARÍA DEL PILAR CARDONA RODRIGUEZ

JECKSON ORLANDO NAVARRO GARZÓN, identificado con la cédula de ciudadanía 91.538.904 de Bucaramanga, portador de la T.P. 218633 del Consejo Superior de la Judicatura, en mi calidad de apoderado de la parte demandante, me permito allegar liquidación del crédito:

MES	PERIODO INTERESES		CUOTA MES	SALDO CAPITAL	CAPITAL	INTERÉS MES	SALDO INTERÉS	INTERÉS TOTAL	%
Mar-16	01-Apr-16	30-Apr-16	\$53.505	0	53505	1211,0134	0	1211,013395	2,26%
Apr-16	01-May-16	31-May-16	\$135.000	53505	188505	4266,55602	1211,0134	5477,569419	2,26%
May-16	01-Jun-16	30-Jun-16	\$135.000	188505	323505	7322,09865	5477,56942	12799,66807	2,26%
Jun-16	01-Jul-16	31-Jul-16	\$135.000	323505	458505	10734,5885	12799,6681	23534,25658	2,34%
Jul-16	05-Aug-16	31-Aug-16	\$135.000	458505	593505	13895,229	23534,2566	37429,48553	2,34%
Aug-16	01-Sep-16	30-Sep-16	\$135.000	593505	728505	17055,8694	37429,4855	54485,35494	2,34%
Sep-16	01-Oct-16	31-Oct-16	\$135.000	728505	863505	20758,5934	54485,3549	75243,94835	2,40%
Oct-16	01-Nov-16	30-Nov-16	\$135.000	863505	998505	24003,983	75243,9484	99247,93132	2,40%
Nov-16	01-Dec-16	31-Dec-16	\$135.000	998505	1133505	27249,3725	99247,9313	126497,3039	2,40%
Dec-16	01-Jan-17	31-Jan-17	\$135.000	1133505	1268505	30921,3415	126497,304	157418,6454	2,44%
Jan-17	01-Feb-17	28-Feb-17	\$144.000	1268505	1412505	34431,5155	157418,645	191850,1608	2,44%
Feb-17	01-Mar-17	31-Mar-17	\$144.000	1412505	1556505	37941,6894	191850,161	229791,8502	2,44%
Mar-17	01-Apr-17	30-Apr-17	\$144.000	1556505	1700505	41435,5532	229791,85	271227,4035	2,44%
Apr-17	01-May-17	31-May-17	\$144.000	1700505	1844505	44944,346	271227,403	316171,7495	2,44%
May-17	01-Jun-17	30-Jun-17	\$144.000	1844505	1988505	48453,1388	316171,749	364624,8883	2,44%
Jun-17	01-Jul-17	31-Jul-17	\$144.000	1988505	2132505	51244,7277	364624,888	415869,616	2,40%
Jul-17	01-Aug-17	31-Aug-17	\$144.000	2132505	2276505	54705,0904	415869,616	470574,7065	2,40%
Aug-17	01-Sep-17	30-Sep-17	\$144.000	2276505	2420505	56997,3789	470574,706	527572,0854	2,35%
Sep-17	01-Oct-17	31-Oct-17	\$144.000	2420505	2564505	59567,928	527572,085	587140,0134	2,32%
Oct-17	01-Nov-17	30-Nov-17	\$144.000	2564505	2708505	62412,5554	587140,013	649552,5688	2,30%
Nov-17	01-Dec-17	31-Dec-17	\$144.000	2708505	2852505	65202,9495	649552,569	714755,5183	2,29%
Dec-17	01-Jan-18	31-Jan-18	\$189.000	2852505	3041505	69285,8355	714755,518	784041,3538	2,28%
Jan-18	01-Feb-18	28-Feb-18	\$189.000	3041505	3230505	74598,2027	784041,354	858639,5565	2,31%
Feb-18	01-Mar-18	31-Mar-18	\$189.000	3230505	3419505	77863,3542	858639,557	936502,9107	2,28%
Mar-18	01-Apr-18	30-Apr-18	\$389.000*	3419505	3808505	85976,9921	936502,911	1022479,903	2,26%
Apr-18	01-May-18	31-May-18	\$189.000	3808505	3997505	90087,2787	1022479,9	1112567,182	2,25%
May-18	01-Jun-18	30-Jun-18	\$189.000	3997505	4186505	93690,7412	1112567,18	1206257,923	2,24%
Jun-18	01-Jul-18	31-Jul-18	\$189.000	4186505	4375505	96847,1201	1206257,92	1303105,043	2,21%
Jul-18	01-Aug-18	31-Aug-18	\$189.000	4375505	4564505	100626,632	1303105,04	1403731,675	2,20%
Aug-18	01-Sep-18	30-Sep-18	\$189.000	4564505	4753505	104185,098	1403731,67	1507916,773	2,19%
Sep-18	01-Oct-18	31-Oct-18	\$189.000	4753505	4942505	107450,572	1507916,77	1615367,345	2,17%
Oct-18	01-Nov-18	30-Nov-18	\$189.000	4942505	5131505	110850,1	1615367,34	1726217,445	2,16%
Nov-18	01-Dec-18	31-Dec-18	\$189.000	5131505	5320505	114459,468	1726217,45	1840676,914	2,15%
Dec-18	01-Jan-19	31-Jan-19	\$189.000	5320505	5509505	117352,457	1840676,91	1958029,37	2,13%

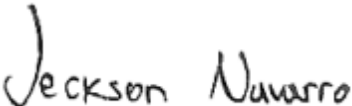
Jan-19	01-Feb-19	28-Feb-19	\$161.000	5509505	5670505	123617,009	1958029,37	2081646,379	2,18%
Feb-19	01-Mar-19	31-Mar-19	\$161.000	5670505	5831505	125377,358	2081646,38	2207023,737	2,15%
Mar-19	01-Apr-19	30-Apr-19	\$322.000**	5831505	6153505	131685,007	2207023,74	2338708,744	2,14%
Apr-19	01-May-19	31-May-19	\$161.000	6153505	6314505	135761,858	2338708,74	2474470,601	2,15%
May-19	01-Jun-19	30-Jun-19	\$161.000	6314505	6475505	138575,807	2474470,6	2613046,408	2,14%
Jun-19	01-Jul-19	31-Jul-19	\$161.000	6475505	6636505	142021,207	2613046,41	2755067,615	2,14%
Jul-19	01-Aug-19	31-Aug-19	\$161.000	6636505	6797505	145466,607	2755067,62	2900534,222	2,14%
Aug-19	01-Sep-19	30-Sep-19	\$161.000	6797505	6958505	148912,007	2900534,22	3049446,229	2,14%
Sep-19	01-Oct-19	31-Oct-19	\$161.000	6958505	7119505	150933,506	3049446,23	3200379,735	2,12%
Oct-19	01-Nov-19	30-Nov-19	\$161.000	7119505	7280505	153618,656	3200379,74	3353998,391	2,11%
Nov-19	01-Dec-19	31-Dec-19	\$161.000	7280505	7441505	156271,605	3353998,39	3510269,996	2,10%
Dec-19	01-Jan-20	31-Jan-20	\$161.000	7441505	7602505	158892,355	3510270	3669162,35	2,09%
Jan-20	01-Feb-20	28-Feb-20	\$178.000	7602505	7780505	164946,706	3669162,35	3834109,056	2,12%
Feb-20	01-Mar-20	31-Mar-20	\$178.000	7780505	7958505	159170,1	3834109,06	3993279,156	2,00%
Mar-20	01-Apr-20	15-Apr-20	\$178.000	7958505	8136505	169239,304	3993279,16	4162518,46	2,08%
Apr-20	01-May-20	31-May-20	\$178.000	8136505	8314505	168784,452	4162518,46	4331302,912	2,03%
May-20	01-Jun-20	30-Jun-20	\$178.000	8314505	8492505	171548,601	4331302,91	4502851,513	2,02%
Jun-20	01-Jul-20	31-Jul-20	\$178.000	8492505	8670505	175144,201	4502851,51	4677995,714	2,02%
Jul-20	01-Aug-20	31-Aug-20	\$178.000	8670505	8848505	180509,502	4677995,71	4858505,216	2,04%
Aug-20	01-Sep-20	30-Sep-20	\$178.000	8848505	9026505	185043,353	4858505,22	5043548,568	2,05%
Sep-20	01-Oct-20	31-Oct-20	\$178.000	9026505	9204505	185931,001	5043548,57	5229479,569	2,02%
Oct-20	01-Nov-20	30-Nov-20	\$178.000	9204505	9382505	186711,85	5229479,57	5416191,419	1,99%
Nov-20	01-Dec-20	30-Dec-20	\$178.000	9382505	9560505	186429,848	5416191,42	5602621,266	1,95%
Dec-20	01-Jan-21	31-Jan-21	\$178.000	9560505	9738505	188926,997	5602621,27	5791548,263	1,94%
Jan-21	01-Feb-21	28-Feb-21	\$184.000	9738505	9922505	194481,098	5791548,26	5986029,361	1,96%
Feb-21	01-Mar-21	31-Mar-21	\$184.000	9922505	10106505	197076,848	5986029,36	6183106,209	1,95%
Mar-21	01-Apr-21	30-Apr-21	\$184.000	10106505	10290505	199635,797	6183106,21	6382742,006	1,94%
Apr-21	01-May-21	31-May-21	\$184.000	10290505	10474505	202157,947	6382742,01	6584899,952	1,93%
May-21	01-Jun-21	30-Jun-21	\$184.000	10474505	10658505	205709,147	6584899,95	6790609,099	1,93%
Jun-21	01-Jul-21	31-Jul-21	\$184.000	10658505	10842505	209260,347	6790609,1	6999869,445	1,93%
Jul-21	01-Aug-21	31-Aug-21	\$184.000	10842505	11026505	213914,197	6999869,45	7213783,642	1,94%
Aug-21	01-Sep-21	30-Sep-21	\$184.000	11026505	11210505	216362,747	7213783,64	7430146,389	1,93%
Sep-21	01-Oct-21	31-Oct-21	\$184.000	11210505	11394505	218774,496	7430146,39	7648920,885	1,92%
Oct-21	01-Nov-21	23-Nov-21	\$184.000	11394505	11578505	172210,964	7648920,88	7821131,844	1,94%

*+ Cuota extraordinaria mar-18: \$200.000
**+ Sanción inasistencia asamblea mar-19: \$161.000

CAPITAL	\$11.578.505
INTERÉS	\$7.821.132
TOTAL	\$19.399.637

Adjunto certificado adicional de deuda, donde consta el valor de las cuotas causadas después de la radicación de la demanda.

Atentamente,


JECKERSON ORLANDO NAVARRO GARZÓN
C.C. 91.538.904 de Bucaramanga.
T. P: 218633 del C.S de la J.

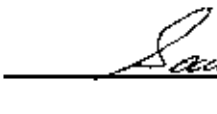


CERTIFICADO DE DEUDA LEY 675 DE 2001
EDIFICIO REYES III Y IV, NIT. 900.160.994-6

Deudores:	MARIA DEL PILAR CARDONA RODRIGUEZ	C.C. No:	51.817.014
Inmueble:	Calle 162 No 18 A - 88 Apartamento 406	Matrícula Inmobiliaria No.	50N-20021116
Valor:	\$ 2.018.000	DOS MILLONES DIECIOCHO MIL PESOS	

	CUOTA MES	VALOR CUOTA	FECHA VENCIMIENTO CUOTA	FECHA DE EXIGIBILIDAD
1.	ORDINARIA DIC-20	\$178.000	31/12/2020	1/01/2021
2.	ORDINARIA ENE-21	\$184.000	31/01/2021	1/02/2021
3.	ORDINARIA FEB-21	\$184.000	28/02/2021	1/03/2021
4.	ORDINARIA MAR-21	\$184.000	31/03/2021	1/04/2021
5.	ORDINARIA ABR-21	\$184.000	30/04/2021	1/05/2021
6.	ORDINARIA MAY-21	\$184.000	31/05/2021	1/06/2021
7.	ORDINARIA JUN-21	\$184.000	30/06/2021	1/07/2021
8.	ORDINARIA JUL-21	\$184.000	31/07/2021	1/08/2021
9.	ORDINARIA AGO-21	\$184.000	31/08/2021	1/09/2021
10.	ORDINARIA SEP-21	\$184.000	30/09/2021	1/10/2021
11.	ORDINARIA OCT-21	\$184.000	31/10/2021	1/11/2021

Representante Legal:	SONIA AURORA GRANADOS ROJAS	C.C. No:	46.354.779
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Edificio Reyes III Y IV Nit. 900.160.994-6 Administración  Firma	Bogotá, 17 de noviembre de 2021
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