Memorial para el Ejecutivo de BANCO DAVIVIENDA S.A. contra SAUL EDUARDO MORENO RAMOS Y OTROS No. 11001310303820190049900 (Allego liquidación de crédito)

edgarmunevar@munevarabogados.com <edgarmunevar@munevarabogados.com>

Vie 3/09/2021 11:29 AM

Para: Juzgado 38 Civil Circuito - Bogota - Bogota D.C. <ccto38bt@cendoj.ramajudicial.gov.co>
CC: dianorarugeles@munevarabogados.com <dianorarugeles@munevarabogados.com>; carlos perez <carlosperez@munevarabogados.com>; Viviana Amaya <vivianaamaya@munevarabogados.com>; JHOJAN MARTINEZ <jhojanmartinez@munevarabogados.com>

2 archivos adjuntos (2 MB)

Saul Moreno- allega liquidación de crédito sep 2 .pdf; SAUL EDUARDO MORENO RAMOS estados de cuenta septiembre 2021.PDF;

Señor(a):
JUEZ 38 CIVIL DEL CIRCUITO DE BOGOTÁ
E. S. D.
ccto38bt@cendoj.ramajudicial.gov.co

REF: Ejecutivo de BANCO DAVIVIENDA S.A. contra SAUL EDUARDO MORENO RAMOS Y OTROS.

No. 11001310303820190049900

Me permito allegar PDF del escrito de liquidación de crédito y estados de cuenta.

Cordialmente,

EDGAR JAVIER MUNEVAR ARCINIEGAS
C.C. No. 79.347.931 de Bogotá
T.P. No. 52.739 del C. S. de la J.
edgarmunevar@munevarabogados.com
Tels: 3462668- 3102339624
Drs

Cordialmente,

MUNEVAR ABOGADOS S.A.S.

DIANORA RUGELES SIERRA
Abogada
Calle 69 A No.4-31 Bogotá, Colombia
Pbx: (571) 3462668 -3102339624
dianorarugeles@munevarabogados.com.

Señor(a):
JUEZ 38 CIVIL DEL CIRCUITO DE BOGOTÁ
E. S. D.
ccto38bt@cendoj.ramajudicial.gov.co

REF: Ejecutivo de BANCO DAVIVIENDA S.A. contra SAUL EDUARDO MORENO RAMOS Y OTROS.

No. 11001310303820190049900

EDGAR JAVIER MUNEVAR ARCINIEGAS, en mi calidad de apoderado judicial de la parte demandante, me permito manifestar lo siguiente:

Allego la **LIQUIDACIÓN DE CRÉDITO,** de conformidad con el artículo 446 del Código General del Proceso, expedida por BANCO DAVIVIENDA S.A., que comprende cánones adeudados junto con los intereses moratorios liquidados con las tasas permitidas para cada periodo.

<u>Contrato de Leasing No. 001-03-0001006409</u>

CÁNONES EN MORA	$ 228,357,625.00
INTERESES MORATORIOS	$ 66,702,497.00
TOTAL	**$ 295.060.122.00**

<u>Contrato de Leasing No. 001-03-0001006410</u>

CÁNONES EN MORA	$ 47,425,798.00
INTERESES MORATORIOS	$ 13,852,916.00
TOTAL	**$ 61.278.714.00**

<u>Contrato de Leasing No. 001-03-0001006411</u>

CÁNONES EN MORA	$ 499,929,383.00
INTERESES MORATORIOS	$ 146,027,704.00
TOTAL	**$ 645.957.087.00**

TOTAL: MIL DOS MILLONES DOSCIENTOS NOVENTA Y CINCO MIL NOVECIENTOS VEINTITRES PESOS ($$1.002.295.923,oo) M/CTE.

Nota: Se tienen en cuenta solo los rubros por concepto de cánones e intereses.

Cordialmente,

EDGAR JAVIER MUNEVAR ARCINIEGAS
C.C. No. 79.347.931 de Bogotá
T.P. No. 52.739 del C. S. de la J.
edgarmunevar@munevarabogados.com
Tels: 3462668- 3102339624
Drs

ESTADO DE CUENTA

CLIENTE: 79944084 MORENO RAMOS SAUL EDUARDO

DIRECCION: CR 11 A 93 A 46 OF 203 **CONTRATO:** 001-03-0001006409-6 **F. CORTE:** 2021-09-06

DEPTO. BOGOTA **CIUDAD:** BOGOTA D.C **TEL:**

ACTIVO : Un(A) Apto. De Habitac. Urbano ; * Fecha Escritura: 23 De Octubre De 2017,* Area Privada: 94.77 Mt2,Chip-Ced Catastral: Aaa0124jnbs,* Direccion: Kr 50 A No 123 A - 34 Ap 501

PROXIMO CANON 44 **VALOR** 7,230,626.00 PE **ANTICIPO:** .00

CTA X PAGAR: .00

CTA. AHORROS : 009400150950 - DAVIVIENDA

HONORARIOS: 35,112,154.00 10% Juridicos

Flujo	Fecha Venc.	Días	Canon	Mora	Seguro	Iva	Timbres	Total Flujo
013	01-03-2019	920	7,450,266.00	4,310,020.00	.00	.00	.00	11,760,286.00
014	01-04-2019	889	7,450,266.00	4,164,791.00	.00	.00	.00	11,615,057.00
015	02-05-2019	858	7,450,266.00	4,019,562.00	.00	.00	.00	11,469,828.00
016	04-06-2019	825	7,450,266.00	3,864,964.00	.00	.00	.00	11,315,230.00
017	02-07-2019	797	7,450,266.00	3,733,789.00	.00	.00	.00	11,184,055.00
018	01-08-2019	767	7,437,288.00	3,586,986.00	.00	.00	.00	11,024,274.00
019	02-09-2019	735	7,437,288.00	3,437,333.00	.00	.00	.00	10,874,621.00
020	01-10-2019	706	7,437,288.00	3,301,711.00	.00	.00	.00	10,738,999.00
021	01-11-2019	675	7,449,503.00	3,161,919.00	.00	.00	.00	10,611,422.00
022	02-12-2019	644	7,449,503.00	3,016,705.00	.00	.00	.00	10,466,208.00
023	02-01-2020	613	7,449,503.00	2,871,491.00	.00	.00	.00	10,320,994.00
024	03-02-2020	581	7,446,382.00	2,720,453.00	.00	.00	.00	10,166,835.00
025	02-03-2020	553	7,446,382.00	2,589,346.00	.00	.00	.00	10,035,728.00
026	01-04-2020	523	7,446,382.00	2,448,876.00	.00	.00	.00	9,895,258.00
027	04-05-2020	490	7,457,046.00	2,297,643.00	.00	.00	.00	9,754,689.00
028	01-06-2020	462	7,457,046.00	2,166,349.00	.00	.00	.00	9,623,395.00
029	01-07-2020	432	7,457,046.00	2,025,677.00	.00	.00	.00	9,482,723.00
030	03-08-2020	399	7,378,000.00	1,851,106.00	.00	.00	.00	9,229,106.00
031	01-09-2020	370	7,378,000.00	1,716,564.00	.00	.00	.00	9,094,564.00
032	01-10-2020	340	7,378,000.00	1,577,383.00	.00	.00	.00	8,955,383.00

ESTADO DE CUENTA

CLIENTE: 79944084 MORENO RAMOS SAUL EDUARDO
DIRECCION: CR 11 A 93 A 46 OF 203 **CONTRATO:** 001-03-0001006409-6 **F. CORTE:** 2021-09-06
DEPTO. BOGOTA **CIUDAD:** BOGOTA D.C **TEL:**
ACTIVO : Un(A) Apto. De Habitac. Urbano ; * Fecha Escritura: 23 De Octubre De 2017,* Area Privada: 94.77 Mt2,Chip-Ced Catastral: Aaa0124jnbs,* Direccion: Kr 50 A No 123 A - 34 Ap 501

033	03-11-2020	307	7,263,060.00	1,402,096.00	.00	.00	.00	8,665,156.00
034	01-12-2020	279	7,263,060.00	1,274,217.00	.00	.00	.00	8,537,277.00
035	04-01-2021	245	7,263,060.00	1,118,936.00	.00	.00	.00	8,381,996.00
036	01-02-2021	217	7,230,636.00	986,634.00	.00	.00	.00	8,217,270.00
037	01-03-2021	189	7,230,636.00	859,326.00	.00	.00	.00	8,089,962.00
038	05-04-2021	154	7,230,636.00	700,192.00	.00	.00	.00	7,930,828.00
039	03-05-2021	126	7,219,766.00	572,023.00	.00	.00	.00	7,791,789.00
040	01-06-2021	97	7,219,766.00	440,367.00	.00	.00	.00	7,660,133.00
041	01-07-2021	67	7,219,766.00	304,171.00	.00	.00	.00	7,523,937.00
042	02-08-2021	35	7,230,626.00	159,134.00	.00	.00	.00	7,389,760.00
043	01-09-2021	5	7,230,626.00	22,733.00	.00	.00	.00	7,253,359.00
TOTAL DETALLE			228,357,625.00	66,702,497.00	.00	.00	.00	295,060,122.00

DEUDORES

Cuenta	Descripción	Total Deudor
169095108	OTROS DEUDORES OPERACIONES	3,214,552.00
163925127	IMPUESTO PREDIAL Y OTROS	4,297,667.00
163925101	GASTOS JUDICIALES	147,265.00
	TOTAL DEUDORES	7,659,484.00

TOTAL INCLUIDO DEUDORES	302,719,606.00
TOTAL INCLUIDO HONORARIOS	337,831,760.00
TOTAL INCLUIDO ANTICIPOS Y CUENTA POR PAGAR	337,831,760.00
TOTAL INCLUIDO TITULO CAP.	337,831,760.00

ESTADO DE CUENTA

CLIENTE: 79944084 MORENO RAMOS SAUL EDUARDO

DIRECCION: CR 11 A 93 A 46 OF 203 **CONTRATO:** 001-03-0001006410-6 **F. CORTE:** 2021-09-06

DEPTO. BOGOTA **CIUDAD:** BOGOTA D.C **TEL:**

ACTIVO : Un(A) Consultorio ; * Fecha Escritura: 2017/10/23,* Area Privada: 14.99mt2,Chip-Ced Catastral: Aaa0106rjnx,* Direccion: Ak 15 No 12 - 45 Of 311

PROXIMO CANON 44 **VALOR** 1,501,672.00 PE **ANTICIPO:** .00

CTA X PAGAR:

CTA. AHORROS : 009400150950 - DAVIVIENDA **HONORARIOS:** 7,292,166.00 10% Juridicos

Flujo	Fecha Venc.	Días	Canon	Mora	Seguro	Iva	Timbres	Total Flujo
013	01-03-2019	920	1,547,287.00	895,114.00	.00	.00	.00	2,442,401.00
014	01-04-2019	889	1,547,287.00	864,953.00	.00	.00	.00	2,412,240.00
015	02-05-2019	858	1,547,287.00	834,791.00	.00	.00	.00	2,382,078.00
016	04-06-2019	825	1,547,287.00	802,684.00	.00	.00	.00	2,349,971.00
017	02-07-2019	797	1,547,287.00	775,441.00	.00	.00	.00	2,322,728.00
018	01-08-2019	767	1,544,592.00	744,953.00	.00	.00	.00	2,289,545.00
019	02-09-2019	735	1,544,592.00	713,873.00	.00	.00	.00	2,258,465.00
020	01-10-2019	706	1,544,592.00	685,706.00	.00	.00	.00	2,230,298.00
021	01-11-2019	675	1,547,129.00	656,674.00	.00	.00	.00	2,203,803.00
022	02-12-2019	644	1,547,129.00	626,516.00	.00	.00	.00	2,173,645.00
023	02-01-2020	613	1,547,129.00	596,358.00	.00	.00	.00	2,143,487.00
024	03-02-2020	581	1,546,480.00	564,989.00	.00	.00	.00	2,111,469.00
025	02-03-2020	553	1,546,480.00	537,761.00	.00	.00	.00	2,084,241.00
026	01-04-2020	523	1,546,480.00	508,588.00	.00	.00	.00	2,055,068.00
027	04-05-2020	490	1,548,695.00	477,179.00	.00	.00	.00	2,025,874.00
028	01-06-2020	462	1,548,695.00	449,912.00	.00	.00	.00	1,998,607.00
029	01-07-2020	432	1,548,695.00	420,697.00	.00	.00	.00	1,969,392.00
030	03-08-2020	399	1,532,279.00	384,442.00	.00	.00	.00	1,916,721.00
031	01-09-2020	370	1,532,279.00	356,500.00	.00	.00	.00	1,888,779.00
032	01-10-2020	340	1,532,279.00	327,594.00	.00	.00	.00	1,859,873.00

ESTADO DE CUENTA

CLIENTE: 79944084 MORENO RAMOS SAUL EDUARDO

DIRECCION: CR 11 A 93 A 46 OF 203 **CONTRATO:** 001-03-0001006410-6 **F. CORTE:** 2021-09-06

DEPTO. BOGOTA **CIUDAD:** BOGOTA D.C **TEL:**

ACTIVO : Un(A) Consultorio ; * Fecha Escritura: 2017/10/23,* Area Privada: 14.99mt2,Chip-Ced Catastral: Aaa0106rjnx,* Direccion: Ak 15 No 12 - 45 Of 311

033	03-11-2020	307	1,508,408.00	291,190.00	.00	.00	.00	1,799,598.00
034	01-12-2020	279	1,508,408.00	264,632.00	.00	.00	.00	1,773,040.00
035	04-01-2021	245	1,508,408.00	232,383.00	.00	.00	.00	1,740,791.00
036	01-02-2021	217	1,501,674.00	204,906.00	.00	.00	.00	1,706,580.00
037	01-03-2021	189	1,501,674.00	178,467.00	.00	.00	.00	1,680,141.00
038	05-04-2021	154	1,501,674.00	145,417.00	.00	.00	.00	1,647,091.00
039	03-05-2021	126	1,499,416.00	118,799.00	.00	.00	.00	1,618,215.00
040	01-06-2021	97	1,499,416.00	91,456.00	.00	.00	.00	1,590,872.00
041	01-07-2021	67	1,499,416.00	63,171.00	.00	.00	.00	1,562,587.00
042	02-08-2021	35	1,501,672.00	33,049.00	.00	.00	.00	1,534,721.00
043	01-09-2021	5	1,501,672.00	4,721.00	.00	.00	.00	1,506,393.00
TOTAL DETALLE			47,425,798.00	13,852,916.00	.00	.00	.00	61,278,714.00

DEUDORES

Cuenta	Descripción	Total Deudor
169095108	OTROS DEUDORES OPERACIONES	1,801,224.00
163925127	IMPUESTO PREDIAL Y OTROS	1,512,333.00
163925101	GASTOS JUDICIALES	13,001.00
	TOTAL DEUDORES	3,326,558.00

TOTAL INCLUIDO DEUDORES	64,605,272.00
TOTAL INCLUIDO HONORARIOS	71,897,438.00
TOTAL INCLUIDO ANTICIPOS Y CUENTA POR PAGAR	71,897,438.00
TOTAL INCLUIDO TITULO CAP.	71,897,438.00

ESTADO DE CUENTA

CLIENTE: 79944084 MORENO RAMOS SAUL EDUARDO

DIRECCION: CR 11 A 93 A 46 OF 203 **CONTRATO:** 001-03-0001006411-3 **F. CORTE:** 2021-09-06

DEPTO. BOGOTA **CIUDAD:** BOGOTA D.C **TEL:**

ACTIVO : Un(A) Apto. De Habitac. Urbano ; * Fecha Escritura: 23/10/2017,* Area Privada: 183.58,Chip-Ced Catastral: Aaa0104hhaw,* Direccion: Cl 119 No 11 B - 83 Ap 102 Gj 4,5,8 Dp 4

PROXIMO CANON 44 **VALOR** 15,829,568.00 PE **ANTICIPO:** .00

CTA X PAGAR:

CTA. AHORROS : 009400150950 - DAVIVIENDA **HONORARIOS:** 76,868,894.00 10% Juridicos

Flujo	Fecha Venc.	Días	Canon	Mora	Seguro	Iva	Timbres	Total Flujo
013	01-03-2019	920	16,310,411.00	9,435,664.00	.00	.00	.00	25,746,075.00
014	01-04-2019	889	16,310,411.00	9,117,723.00	.00	.00	.00	25,428,134.00
015	02-05-2019	858	16,310,410.00	8,799,781.00	.00	.00	.00	25,110,191.00
016	04-06-2019	825	16,310,410.00	8,461,328.00	.00	.00	.00	24,771,738.00
017	02-07-2019	797	16,310,410.00	8,174,156.00	.00	.00	.00	24,484,566.00
018	01-08-2019	767	16,281,999.00	7,852,769.00	.00	.00	.00	24,134,768.00
019	02-09-2019	735	16,281,999.00	7,525,143.00	.00	.00	.00	23,807,142.00
020	01-10-2019	706	16,281,999.00	7,228,233.00	.00	.00	.00	23,510,232.00
021	01-11-2019	675	16,308,742.00	6,922,197.00	.00	.00	.00	23,230,939.00
022	02-12-2019	644	16,308,742.00	6,604,289.00	.00	.00	.00	22,913,031.00
023	02-01-2020	613	16,308,742.00	6,286,380.00	.00	.00	.00	22,595,122.00
024	03-02-2020	581	16,301,908.00	5,955,720.00	.00	.00	.00	22,257,628.00
025	02-03-2020	553	16,301,908.00	5,668,698.00	.00	.00	.00	21,970,606.00
026	01-04-2020	523	16,301,908.00	5,361,173.00	.00	.00	.00	21,663,081.00
027	04-05-2020	490	16,325,255.00	5,030,090.00	.00	.00	.00	21,355,345.00
028	01-06-2020	462	16,325,255.00	4,742,656.00	.00	.00	.00	21,067,911.00
029	01-07-2020	432	16,325,255.00	4,434,692.00	.00	.00	.00	20,759,947.00
030	03-08-2020	399	16,152,205.00	4,052,513.00	.00	.00	.00	20,204,718.00
031	01-09-2020	370	16,152,205.00	3,757,970.00	.00	.00	.00	19,910,175.00
032	01-10-2020	340	16,152,205.00	3,453,269.00	.00	.00	.00	19,605,474.00

ESTADO DE CUENTA

CLIENTE: 79944084 MORENO RAMOS SAUL EDUARDO

DIRECCION: CR 11 A 93 A 46 OF 203 **CONTRATO:** 001-03-0001006411-3 **F. CORTE:** 2021-09-06

DEPTO. BOGOTA **CIUDAD:** BOGOTA D.C **TEL:**

ACTIVO : Un(A) Apto. De Habitac. Urbano ; * Fecha Escritura: 23/10/2017,* Area Privada: 183.58,Chip-Ced Catastral: Aaa0104hhaw,* Direccion: Cl 119 No 11 B - 83 Ap 102 Gj 4,5,8 Dp 4

033	03-11-2020	307	15,900,574.00	3,069,523.00	.00	.00	.00	18,970,097.00
034	01-12-2020	279	15,900,574.00	2,789,566.00	.00	.00	.00	18,690,140.00
035	04-01-2021	245	15,900,574.00	2,449,619.00	.00	.00	.00	18,350,193.00
036	01-02-2021	217	15,829,590.00	2,159,977.00	.00	.00	.00	17,989,567.00
037	01-03-2021	189	15,829,590.00	1,881,270.00	.00	.00	.00	17,710,860.00
038	05-04-2021	154	15,829,590.00	1,532,887.00	.00	.00	.00	17,362,477.00
039	03-05-2021	126	15,805,792.00	1,252,295.00	.00	.00	.00	17,058,087.00
040	01-06-2021	97	15,805,792.00	964,068.00	.00	.00	.00	16,769,860.00
041	01-07-2021	67	15,805,792.00	665,903.00	.00	.00	.00	16,471,695.00
042	02-08-2021	35	15,829,568.00	348,383.00	.00	.00	.00	16,177,951.00
043	01-09-2021	5	15,829,568.00	49,769.00	.00	.00	.00	15,879,337.00
TOTAL DETALLE			499,929,383.00	146,027,704.00	.00	.00	.00	645,957,087.00

DEUDORES

Cuenta	Descripción	Total Deudor
169095108	OTROS DEUDORES OPERACIONES	7,211,880.00
163925101	GASTOS JUDICIALES	14,301.00
163925127	IMPUESTO PREDIAL Y OTROS	18,048,333.00
	TOTAL DEUDORES	25,274,514.00

TOTAL INCLUIDO DEUDORES	671,231,601.00
TOTAL INCLUIDO HONORARIOS	748,100,495.00
TOTAL INCLUIDO ANTICIPOS Y CUENTA POR PAGAR	748,100,495.00
TOTAL INCLUIDO TITULO CAP.	748,100,495.00