

**ANDRES FELIPE VELA SILVA**  
**ABOGADO**

Señor

**JUEZ SEGUNDO CIVIL MUNICIPAL DE NEIVA-HUILA**

**E.**

**S.**

**D.**

**REFERENCIA: DEMANDA EJECUTIVA.**

**DEMANDANTE: BANCO PICHINCHA S.A.**

**DEMANDADO: RAMIRO ESPINOSA HERRERA**

**RADICADO: 2015-415**

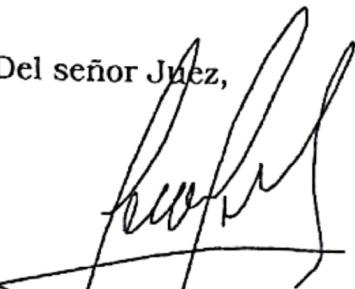
**ANDRES FELIPE VELA SILVA**, mayor de edad, abogado en ejercicio, identificado con la cédula de ciudadanía No. C.C. No. 1.075.289.535 de Neiva y portador de la Tarjeta Profesional No. T.P. No. 328.610 del C.S.J., muy respetuosamente manifiesto al Señor Juez que como apoderado jurídico del **BANCO PICHINCHA**, me permito adjuntar la liquidación del crédito actualizado y sus intereses en cumplimiento de lo preceptuado conforme al **Art. 446 del C.G.P.**

Anexo liquidación de (los) siguiente(s) créditos(s)

- Liquidación que se contrae por escrito y se presenta de 2 folio(s), arrojando un total de \$ 185.301.359 M/CTE de la obligación No. 2928454 Y 2897875.

Así mismo, solicito al señor juez, se sirva ordenar hacer la entrega de títulos judiciales puestos a disposición del despacho a que haya lugar y hasta la ocurrencia del crédito, a favor del suscrito.

Del señor Juez,



**ANDRES FELIPE VELA SILVA**  
**C.C. No. 1.075.289.535 de Neiva**  
**T.P. No. 328.610 del C.S.J.**

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*Neiva – Huila*

Obligación No 1 RAMIRO ESPINOSA HERRERA

| desde      | hasta      | dias | TEA   | intereses  | abono | abo a intereses | abo a capital | saldo a pagar | saldo capit | saldo interes |
|------------|------------|------|-------|------------|-------|-----------------|---------------|---------------|-------------|---------------|
| 2015-05-20 | 2015-05-20 | 0    | 29.05 | 0          | 0     | 0               | 0             | 54,053,288    | 49,196,005  | 1,857,283     |
| 2015-05-20 | 2015-06-30 | 42   | 29.05 | 1,465,093  | 0     | 0               | 0             | 55,518,381    | 49,196,005  | 6,322,376     |
| 2015-07-01 | 2015-09-30 | 92   | 28.89 | 3,249,844  | 0     | 0               | 0             | 58,768,225    | 49,196,005  | 9,572,220     |
| 2015-10-01 | 2015-12-31 | 92   | 28.99 | 3,260,097  | 0     | 0               | 0             | 62,028,322    | 49,196,005  | 12,832,317    |
| 2016-01-01 | 2016-03-31 | 91   | 29.52 | 3,277,141  | 0     | 0               | 0             | 65,305,463    | 49,196,005  | 16,109,458    |
| 2016-04-01 | 2016-06-30 | 91   | 30.81 | 3,406,955  | 0     | 0               | 0             | 68,712,418    | 49,196,005  | 19,516,413    |
| 2016-07-01 | 2016-09-30 | 92   | 32.01 | 3,566,981  | 0     | 0               | 0             | 72,279,399    | 49,196,005  | 23,083,394    |
| 2016-10-01 | 2016-12-31 | 92   | 32.98 | 3,664,435  | 0     | 0               | 0             | 75,943,834    | 49,196,005  | 26,747,829    |
| 2017-01-01 | 2017-03-31 | 90   | 33.51 | 3,633,731  | 0     | 0               | 0             | 79,577,566    | 49,196,005  | 30,381,561    |
| 2017-04-01 | 2017-06-30 | 91   | 33.49 | 3,673,604  | 0     | 0               | 0             | 83,251,169    | 49,196,005  | 34,055,164    |
| 2017-07-01 | 2017-09-30 | 92   | 32.97 | 3,663,433  | 0     | 0               | 0             | 86,914,602    | 49,196,005  | 37,718,597    |
| 2017-10-01 | 2017-12-31 | 92   | 31.72 | 3,537,742  | 0     | 0               | 0             | 90,452,344    | 49,196,005  | 41,256,339    |
| 2018-01-01 | 2018-01-31 | 31   | 31.04 | 1,142,594  | 0     | 0               | 0             | 91,594,938    | 49,196,005  | 42,398,933    |
| 2018-02-01 | 2018-02-28 | 28   | 31.52 | 1,044,960  | 0     | 0               | 0             | 92,639,898    | 49,196,005  | 43,443,893    |
| 2018-03-01 | 2018-03-31 | 31   | 31.02 | 1,141,942  | 0     | 0               | 0             | 93,781,840    | 49,196,005  | 44,585,835    |
| 2018-04-01 | 2018-04-30 | 30   | 30.72 | 1,095,218  | 0     | 0               | 0             | 94,877,058    | 49,196,005  | 45,681,053    |
| 2018-05-01 | 2018-05-31 | 31   | 30.66 | 1,130,180  | 0     | 0               | 0             | 96,007,238    | 49,196,005  | 46,811,233    |
| 2018-06-01 | 2018-06-30 | 30   | 30.42 | 1,085,722  | 0     | 0               | 0             | 97,092,959    | 49,196,005  | 47,896,954    |
| 2018-07-01 | 2018-08-31 | 62   | 30.05 | 2,245,417  | 0     | 0               | 0             | 99,338,376    | 49,196,005  | 50,142,371    |
| 2018-09-01 | 2018-09-30 | 30   | 29.71 | 1,063,167  | 0     | 0               | 0             | 100,401,543   | 49,196,005  | 51,205,538    |
| 2018-10-01 | 2018-10-31 | 31   | 29.45 | 1,090,428  | 0     | 0               | 0             | 101,491,971   | 49,196,005  | 52,295,966    |
| 2018-11-01 | 2018-11-30 | 30   | 29.23 | 1,047,854  | 0     | 0               | 0             | 102,539,825   | 49,196,005  | 53,343,820    |
| 2018-12-01 | 2018-12-31 | 31   | 29.10 | 1,078,867  | 0     | 0               | 0             | 103,618,692   | 49,196,005  | 54,422,687    |
| 2019-01-01 | 2019-03-31 | 90   | 28.74 | 3,161,927  | 0     | 0               | 0             | 106,780,619   | 49,196,005  | 57,584,614    |
| 2019-04-01 | 2019-04-30 | 30   | 28.98 | 1,039,858  | 0     | 0               | 0             | 107,820,477   | 49,196,005  | 58,624,472    |
| 2019-05-01 | 2019-05-31 | 31   | 29.01 | 1,075,889  | 0     | 0               | 0             | 108,896,366   | 49,196,005  | 59,700,361    |
| 2019-06-01 | 2019-06-30 | 30   | 28.95 | 1,038,898  | 0     | 0               | 0             | 109,935,263   | 49,196,005  | 60,739,258    |
| 2019-07-01 | 2019-08-31 | 62   | 28.92 | 2,169,218  | 0     | 0               | 0             | 112,104,481   | 49,196,005  | 62,908,476    |
| 2019-09-01 | 2019-09-30 | 30   | 28.98 | 1,039,858  | 0     | 0               | 0             | 113,144,339   | 49,196,005  | 63,948,334    |
| 2019-10-01 | 2019-10-31 | 31   | 28.65 | 1,063,959  | 0     | 0               | 0             | 114,208,298   | 49,196,005  | 65,012,293    |
| 2019-11-01 | 2019-11-30 | 30   | 28.55 | 1,026,072  | 0     | 0               | 0             | 115,234,370   | 49,196,005  | 66,038,365    |
| 2019-12-01 | 2019-12-31 | 31   | 28.37 | 1,054,659  | 0     | 0               | 0             | 116,289,029   | 49,196,005  | 67,093,024    |
| 2020-01-01 | 2020-01-31 | 31   | 28.16 | 1,047,672  | 0     | 0               | 0             | 117,336,702   | 49,196,005  | 68,140,697    |
| 2020-02-01 | 2020-02-29 | 29   | 28.59 | 992,767    | 0     | 0               | 0             | 118,329,469   | 49,196,005  | 69,133,464    |
| 2020-03-01 | 2020-03-31 | 31   | 28.42 | 1,056,322  | 0     | 0               | 0             | 119,385,790   | 49,196,005  | 70,189,785    |
| Totales:   |            |      |       | 65,332,504 | 0     | 0               | 0             | 0             | 0           | 0             |

Obligación No 2 RAMIRO ESPINOSA HERRERA

| desde      | hasta      | dias | TEA   | intereses | abono | abo a intereses | abo a capital | saldo a pagar | saldo capit | saldo interes |
|------------|------------|------|-------|-----------|-------|-----------------|---------------|---------------|-------------|---------------|
| 2015-05-20 | 2015-05-20 | 0    | 29.05 | 0         | 0     | 0               | 0             | 29,910,507    | 27,112,159  | 2,798,348     |
| 2015-05-20 | 2015-06-30 | 42   | 29.05 | 807,420   | 0     | 0               | 0             | 30,717,927    | 27,112,159  | 3,605,768     |
| 2015-07-01 | 2015-09-30 | 92   | 28.89 | 1,791,005 | 0     | 0               | 0             | 32,508,932    | 27,112,159  | 5,396,773     |
| 2015-10-01 | 2015-12-31 | 92   | 28.99 | 1,796,656 | 0     | 0               | 0             | 34,305,587    | 27,112,159  | 7,193,428     |
| 2016-01-01 | 2016-03-31 | 91   | 29.52 | 1,806,048 | 0     | 0               | 0             | 36,111,636    | 27,112,159  | 8,999,477     |
| 2016-04-01 | 2016-06-30 | 91   | 30.81 | 1,877,590 | 0     | 0               | 0             | 37,989,225    | 27,112,159  | 10,877,066    |
| 2016-07-01 | 2016-09-30 | 92   | 32.01 | 1,965,781 | 0     | 0               | 0             | 39,955,006    | 27,112,159  | 12,842,847    |
| 2016-10-01 | 2016-12-31 | 92   | 32.98 | 2,019,488 | 0     | 0               | 0             | 41,974,494    | 27,112,159  | 14,862,335    |
| 2017-01-01 | 2017-03-31 | 90   | 33.51 | 2,002,567 | 0     | 0               | 0             | 43,977,061    | 27,112,159  | 16,864,902    |
| 2017-04-01 | 2017-06-30 | 91   | 33.49 | 2,024,541 | 0     | 0               | 0             | 46,001,602    | 27,112,159  | 18,889,443    |
| 2017-07-01 | 2017-09-30 | 92   | 32.97 | 2,018,936 | 0     | 0               | 0             | 48,020,538    | 27,112,159  | 20,908,379    |
| 2017-10-01 | 2017-12-31 | 92   | 31.72 | 1,949,667 | 0     | 0               | 0             | 49,970,205    | 27,112,159  | 22,858,046    |
| 2018-01-01 | 2018-01-31 | 31   | 31.04 | 629,689   | 0     | 0               | 0             | 50,599,894    | 27,112,159  | 23,487,735    |
| 2018-02-01 | 2018-02-28 | 28   | 31.52 | 575,883   | 0     | 0               | 0             | 51,175,777    | 27,112,159  | 24,063,618    |
| 2018-03-01 | 2018-03-31 | 31   | 31.02 | 629,330   | 0     | 0               | 0             | 51,805,106    | 27,112,159  | 24,692,947    |
| 2018-04-01 | 2018-04-30 | 30   | 30.72 | 603,580   | 0     | 0               | 0             | 52,408,686    | 27,112,159  | 25,296,527    |
| 2018-05-01 | 2018-05-31 | 31   | 30.66 | 622,848   | 0     | 0               | 0             | 53,031,534    | 27,112,159  | 25,919,375    |
| 2018-06-01 | 2018-06-30 | 30   | 30.42 | 598,346   | 0     | 0               | 0             | 53,629,880    | 27,112,159  | 26,517,721    |
| 2018-07-01 | 2018-08-31 | 62   | 30.05 | 1,237,460 | 0     | 0               | 0             | 54,867,341    | 27,112,159  | 27,755,182    |



**Obligación No 2 RAMIRO ESPINOSA HERRERA**

| desde      | hasta      | días | TEA   | intereses  | abono | abo a intereses | abo a capital | saldo a pagar | saldo capit | saldo interes |
|------------|------------|------|-------|------------|-------|-----------------|---------------|---------------|-------------|---------------|
| 2018-09-01 | 2018-09-30 | 30   | 29.71 | 585,916    | 0     | 0               | 0             | 55,453,257    | 27,112,159  | 28,341,098    |
| 2018-10-01 | 2018-10-31 | 31   | 29.45 | 600,940    | 0     | 0               | 0             | 56,054,197    | 27,112,159  | 28,942,038    |
| 2018-11-01 | 2018-11-30 | 30   | 29.23 | 577,477    | 0     | 0               | 0             | 56,631,675    | 27,112,159  | 29,519,516    |
| 2018-12-01 | 2018-12-31 | 31   | 29.10 | 594,569    | 0     | 0               | 0             | 57,226,244    | 27,112,159  | 30,114,085    |
| 2019-01-01 | 2019-03-31 | 90   | 28.74 | 1,742,553  | 0     | 0               | 0             | 58,968,797    | 27,112,159  | 31,856,638    |
| 2019-04-01 | 2019-04-30 | 30   | 28.98 | 573,071    | 0     | 0               | 0             | 59,541,868    | 27,112,159  | 32,429,709    |
| 2019-05-01 | 2019-05-31 | 31   | 29.01 | 592,928    | 0     | 0               | 0             | 60,134,795    | 27,112,159  | 33,022,636    |
| 2019-06-01 | 2019-06-30 | 30   | 28.95 | 572,542    | 0     | 0               | 0             | 60,707,337    | 27,112,159  | 33,595,178    |
| 2019-07-01 | 2019-08-31 | 62   | 28.92 | 1,195,466  | 0     | 0               | 0             | 61,902,803    | 27,112,159  | 34,790,644    |
| 2019-09-01 | 2019-09-30 | 30   | 28.98 | 573,071    | 0     | 0               | 0             | 62,475,874    | 27,112,159  | 35,363,715    |
| 2019-10-01 | 2019-10-31 | 31   | 28.65 | 586,353    | 0     | 0               | 0             | 63,062,227    | 27,112,159  | 35,950,068    |
| 2019-11-01 | 2019-11-30 | 30   | 28.55 | 565,473    | 0     | 0               | 0             | 63,627,700    | 27,112,159  | 36,515,541    |
| 2019-12-01 | 2019-12-31 | 31   | 28.37 | 581,228    | 0     | 0               | 0             | 64,208,928    | 27,112,159  | 37,096,769    |
| 2020-01-01 | 2020-01-31 | 31   | 28.16 | 577,377    | 0     | 0               | 0             | 64,786,306    | 27,112,159  | 37,674,147    |
| 2020-02-01 | 2020-02-29 | 29   | 28.59 | 547,119    | 0     | 0               | 0             | 65,333,425    | 27,112,159  | 38,221,266    |
| 2020-03-01 | 2020-03-31 | 31   | 28.42 | 582,144    | 0     | 0               | 0             | 65,915,569    | 27,112,159  | 38,803,410    |
| Totales:   |            |      |       | 36,005,062 | 0     | 0               | 0             | 0             | 0           | 0             |

Total intereses generados por todas las obligaciones \$ 101,337,566

TEA = Tasa de interes efectiva anual aplicada en el periodo

Intereses liquidados segun formulas matematicas referidas en la Resolucion No 0259 de 2009 Superintendencia Financiera, art. 884Codigo de Comercio, Ley 510 de 1.999, etc

| Saldo por pagar de cada Obligación |            |             |             |
|------------------------------------|------------|-------------|-------------|
| obliga                             | capital    | intereses   | total       |
| 1                                  | 49,196,005 | 70,189,785  | 119,385,790 |
| 2                                  | 27,112,159 | 38,803,410  | 65,915,569  |
| Totales                            | 76,308,164 | 108,993,195 | 185,301,359 |