## PROCESO EJECUTIVO No 2021-0232 de SCOTIABANK COLPATRIA S.A. contra OSCAR JAVIER SIERRA RINCON – PRESENTANDO LA LIQUIDACIÓN ACTUALIZADA DE LOS CRÉDITOS QUE SE EJECUTAN.

Dario A R <reyesdaalf@gmail.com>

Lun 4/04/2022 11:13 AM

Para: Juzgado 36 Civil Municipal - Bogotá - Bogotá D.C. <cmpl36bt@cendoj.ramajudicial.gov.co>

Buenos días.

Actuando en mi condición de Apoderado Judicial de la parte demandante del proceso mencionado en el asunto, y escribiendo desde mi correo electrónico inscrito en el Registro Nacional de Abogados, adjunto archivo en PDF, que contiene el memorial, y anexos, mediante el cual se materializa el tema mencionado también en el asunto.

Por favor acusar recibido. Gracias

Cordial saludo,

Dario Alfonso Reyes Gómez
Abogado
CC 79505120 de Bogotá
TP 82407 CSJ
Carrera 15 No. 74-15, oficina 408, Bogotá - Colombia
Tel: (+57)1 4021516, 3153635844 o 3118733350

## Señor JUEZ TREINTA Y SEIS (36) CIVIL MUNICIPAL DE BOGOTA E. S. D.

REF:

PROCESO EJECUTIVO No. 2021-0232 de SCOTIABANK

COLPATRIA S.A. contra OSCAR JAVIER SIERRA RINCON

ASUNTO:

PRESENTANDO LAS LIQUIDACIONES ACTUALIZADAS DE LOS

CREDITOS QUE SE EJECUTAN.

DARIO ALFONSO REYES GOMEZ, ciudadano colombiano, mayor de edad, con domicilio en la ciudad de Bogotá, identificado como aparece al pie de mi firma, actuando como Apoderado Judicial de la parte actora en el proceso de la referencia, con absoluto respeto me permito presentar las liquidaciones de los créditos de Scotiabank Colpatria S.A. Actualizadas al 28 de marzo de 2022

| Obligación No 421720307998       | por valor | \$14.247.730,72 |
|----------------------------------|-----------|-----------------|
| Obligación No 1005039181         | por valor | \$2.564.504,53  |
| Obligación No 5549332000096754   | Por valor | \$25.254.448,00 |
| Obligación No 459356000111173257 | Por valor | \$46.660.876,34 |

Sírvase tener en cuenta la liquidación de los créditos, presentada por la suma total de \$ 88.727.559,59 y de la misma correr traslado a la parte pasiva, en los términos del artículo 521, numeral 2, del Código de Procedimiento Civil, hoy artículo 446 del Código General del Proceso.

Del Señor Juez, atentamente,

DARIO ALFONSO REYES GOMEZ C. C. 79.505.120 de Bogotá T. P. 82.407 del C. S. de la J.

CORREO ELECTRONICO INSCRITO EN EL REGISTRO NACIONAL DE ABOGADOS: reyesdaalf@gmail.com

DEMANDANTE: RF ENCORE S.A.S CESIONARIO BANCO SCOTIABANK - COLPATRIA

**DEMANDADO: OSCAR JAVIER SIERRA RINCON** 

RADICADO: 2021 - 00232

| OBLIGACI | ION CONTE | NIDA EN EL F | ] | CAPITA |       |  |
|----------|-----------|--------------|---|--------|-------|--|
|          |           |              |   |        | _<br> |  |
|          |           |              | 1 |        |       |  |

| fecha      | capital         | intereses<br>moratorios | interes moratorio<br>mensual | valor de interes | dias | meses | interes causados | pagos | interes acumulado | deuda total     |     |
|------------|-----------------|-------------------------|------------------------------|------------------|------|-------|------------------|-------|-------------------|-----------------|-----|
| 11/12/2020 | \$10.835.103,19 | 26,19%                  | 1,96%                        | \$212.086,13     |      |       |                  |       |                   |                 |     |
| 31/12/2020 | \$10.835.103,19 | 26,19%                  | 1,96%                        | \$212.086,13     | 20   | 0,68  | \$144.706,96     |       | \$144.706,96      | \$10.979.810,15 |     |
| 31/01/2021 | \$10.835.103,19 | 25,98%                  | 1,94%                        | \$210.552,94     | 31   | 1,06  | \$222.674,32     |       | \$367.381,28      | \$11.202.484,47 |     |
| 28/02/2021 | \$10.835.103,19 | 26,31%                  | 1,97%                        | \$212.961,19     | 28   | 0,96  | \$203.425,61     |       | \$570.806,89      | \$11.405.910,08 | -   |
| 31/03/2021 | \$10.835.103,19 | 26,12%                  | 1,95%                        | \$211.538,83     | 31   | 1,06  | \$223.716,97     |       | \$794.523,87      | \$11.629.627,06 |     |
| 30/04/2021 | \$10.835.103,19 | 25,97%                  | 1,94%                        | \$210.443,34     | 30   | 1,02  | \$215.379,11     |       | \$1.009.902,97    | \$11.845.006,16 |     |
| 31/05/2021 | \$10.835.103,19 | 25,83%                  | 1,93%                        | \$209.456,37     | 31   | 1,06  | \$221.514,62     |       | \$1.231.417,60    | \$12.066.520,79 |     |
| 30/06/2021 | \$10.835.103,19 | 25,82%                  | 1,93%                        | \$209.346,64     | 30   | 1,02  | \$214.256,69     |       | \$1.445.674,29    | \$12.280.777,48 |     |
| 31/07/2021 | \$10.835.103,19 | 25,77%                  | 1,93%                        | \$209.017,40     | 31   | 1,06  | \$221.050,39     |       | \$1.666.724,68    | \$12.501.827,87 |     |
| 30/08/2021 | \$10.835.103,19 | 25,86%                  | 1,94%                        | \$209.675,78     | 30   | 1,02  | \$214.593,55     |       | \$1.881.318,23    | \$12.716.421,42 |     |
| 30/09/2021 | \$10.835.103,19 | 25,79%                  | 1,93%                        | \$209.127,16     | 31   | 1,06  | \$221.166,47     |       | \$2.102.484,69    | \$12.937.587,88 |     |
| 31/10/2021 | \$10.835.103,19 | 25,62%                  | 1,92%                        | \$207.919,15     | 31   | 1,06  | \$219.888,91     |       | \$2.322.373,61    | \$13.157.476,80 |     |
| 30/11/2021 | \$10.835.103,19 | 25,91%                  | 1,94%                        | \$210.004,80     | 30   | 1,02  | \$214.930,29     |       | \$2.537.303,89    | \$13.372.407,08 |     |
| 31/12/2021 | \$10.835.103,19 | 26,19%                  | 1,96%                        | \$212.086,13     | 31   | 1,06  | \$224.295,78     |       | \$2.761.599,67    | \$13.596.702,86 |     |
| 31/01/2022 | \$10.835.103,19 | 26,49%                  | 1,98%                        | \$214.272,35     | 31   | 1,06  | \$226.607,86     |       | \$2.988.207,54    | \$13.823.310,73 |     |
| 28/02/2022 | \$10.835.103,19 | 27,45%                  | 2,04%                        | \$221.236,46     | 28   | 0,96  | \$211.330,35     |       | \$3.199.537,89    | \$14.034.641,08 |     |
| 28/03/2022 | \$10.835.103,19 | 27,71%                  | 2,06%                        | \$223.078,22     | 28   | 0,96  | \$213.089,64     |       | \$3.412.627,53    | \$14.247.730,72 | 947 |

25 29,3125

| Capital            | \$10.835.103,19 |
|--------------------|-----------------|
| Intereses de Plazo | \$621.692,20    |
| Intereses Mora     | \$3.412.627,53  |
| Total              | \$14.247.730,72 |

\$10.835.103,19

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DEMANDANTE: RF ENCORE S.A.S CESIONARIO BANCO SCOTIABANK - COLPATRIA

DEMANDADO: OSCAR JAVIER SIERRA RINCON

RADICADO: 2021 - 00232

OBLIGACION CONTENIDA EN EL PAGARE No. 1005039181

CAPITAL \$1.950.252,41

| fecha      | capital        | intereses<br>moratorios | interes moratorio<br>mensual | valor de interes | dias | meses | interes causados | pagos | interes acumulado | deuda total    |  |
|------------|----------------|-------------------------|------------------------------|------------------|------|-------|------------------|-------|-------------------|----------------|--|
| 11/12/2020 | \$1.950.252,41 | 26,19%                  | 1,96%                        | \$38.174,21      |      |       |                  |       |                   |                |  |
| 31/12/2020 | \$1.950.252,41 | 26,19%                  | 1,96%                        | \$38.174,21      | 20   | 0,68  | \$26.046,37      |       | \$26.046,37       | \$1.976.298,78 |  |
| 31/01/2021 | \$1.950.252,41 | 25,98%                  | 1,94%                        | \$37.898,24      | 31   | 1,06  | \$40.080,02      |       | \$66.126,39       | \$2.016.378.80 |  |
| 28/02/2021 | \$1.950.252,41 | 26,31%                  | 1,97%                        | \$38.331,71      | 28   | 0,96  | \$36.615,37      |       | \$102.741,76      |                |  |
| 31/03/2021 | \$1.950.252,41 | 26,12%                  | 1,95%                        | \$38.075,70      | 31   | 1,06  | \$40.267,69      |       | \$143.009,44      | \$2.052.994,17 |  |
| 30/04/2021 | \$1.950.252,41 | 25,97%                  | 1,94%                        | \$37.878,52      | 30   | 1,02  | \$38.766,92      |       | \$181.776,37      | \$2.093.261,85 |  |
| 31/05/2021 | \$1.950.252,41 | 25,83%                  | 1,93%                        | \$37.700,87      | 31   | 1,06  | \$39.871,28      |       | \$221.647,65      | \$2.132.028,78 |  |
| 30/06/2021 | \$1.950.252,41 | 25,82%                  | 1,93%                        | \$37.681,12      | 30   | 1.02  | \$38.564,90      |       | \$260.212,54      | \$2.171.900,06 |  |
| 31/07/2021 | \$1.950.252,41 | 25,77%                  | 1,93%                        | \$37.621,86      | 31   | 1,06  | \$39.787,72      |       | \$300.000,26      | \$2.210.464,95 |  |
| 30/08/2021 | \$1.950.252,41 | 25,86%                  | 1,94%                        | \$37.740,36      | 30   | 1,02  | \$38.625,53      |       |                   | \$2.250.252,67 |  |
| 30/09/2021 | \$1.950.252,41 | 25,79%                  | 1,93%                        | \$37.641,61      | 31   | 1,06  | \$39.808,61      |       | \$338.625,79      | \$2.288.878,20 |  |
| 31/10/2021 | \$1.950.252,41 | 25,62%                  | 1,92%                        | \$37.424,18      | 31   | 1,06  | \$39.578,66      |       | \$378.434,41      | \$2.328.686,82 |  |
| 30/11/2021 | \$1.950.252,41 | 25,91%                  | 1,94%                        | \$37.799,58      | 30   | 1,02  | \$38.686,14      |       | \$418.013,07      | \$2.368.265,48 |  |
| 31/12/2021 | \$1.950.252,41 | 26,19%                  | 1,96%                        | \$38.174,21      | 31   | 1,06  | \$40.371,87      |       | \$456.699,21      | \$2.406.951,62 |  |
| 31/01/2022 | \$1.950.252,41 | 26,49%                  | 1,98%                        | \$38.567,71      | 31   | 1,06  | \$40.788,03      |       | \$497.071,08      | \$2.447.323,49 |  |
| 28/02/2022 | \$1.950.252,41 | 27,45%                  | 2,04%                        | \$39.821,21      | 28   | 0,96  | \$38.038,17      |       | \$537.859,11      | \$2.488.111,52 |  |
| 28/03/2022 | \$1.950.252,41 | 27,71%                  | 2,06%                        | \$40.152,72      | 28   | 0,96  |                  |       | \$575.897,28      | \$2.526.149,69 |  |
|            |                |                         |                              | Ţ.0.13L//L       | 20   | 0,30  | \$38.354,83      |       | \$614.252,12      | \$2.564.504,53 |  |

29,3125

| Capital            | \$1.950.252,41 |
|--------------------|----------------|
| Intereses de Plazo | \$750.986,38   |
| Intereses Mora     | \$614.252,12   |
| Total              | \$2.564.504,53 |

DEMANDANTE: RF ENCORE S.A.S CESIONARIO BANCO SCOTIABANK - COLPATRIA

**DEMANDADO: OSCAR JAVIER SIERRA RINCON** 

RADICADO: 2021 - 00232

OBLIGACION CONTENIDA EN EL PAGARE No. 5549332000096754

CAPITAL \$19.205.483,00

|   | fecha      | capital         | intereses  | interes moratorio | valor de interes | dias | meses | interes causados | pagos | interes acumulado | deuda total     |   |
|---|------------|-----------------|------------|-------------------|------------------|------|-------|------------------|-------|-------------------|-----------------|---|
|   |            |                 | moratorios | mensual           |                  |      |       |                  | P-8-5 |                   |                 |   |
|   | 11/12/2020 | \$19.205.483,00 | 26,19%     | 1,96%             | \$375.927,81     |      |       |                  |       |                   |                 |   |
| ) | 31/12/2020 | \$19.205.483,00 | 26,19%     | 1,96%             | \$375.927,81     | 20   | 0,68  | \$256.496,58     |       | \$256.496,58      | \$19.461.979,58 |   |
| L | 31/01/2021 | \$19.205.483,00 | 25,98%     | 1,94%             | \$373.210,19     | 31   | 1,06  | \$394.695,64     |       | \$651.192,22      | \$19.856.675,22 |   |
| 3 | 28/02/2021 | \$19.205.483,00 | 26,31%     | 1,97%             | \$377.478,87     | 28   | 0,96  | \$360.576,83     |       | \$1.011.769,05    | \$20.217.252,05 |   |
| L | 31/03/2021 | \$19.205.483,00 | 26,12%     | 1,95%             | \$374.957,71     | 31   | 1,06  | \$396.543,76     |       | \$1.408.312,81    | \$20.613.795,81 |   |
| ) | 30/04/2021 | \$19.205.483,00 | 25,97%     | 1,94%             | \$373.015,91     | 30   | 1,02  | \$381.764,69     |       | \$1.790.077,50    | \$20.995.560,50 |   |
| - | 31/05/2021 | \$19.205.483,00 | 25,83%     | 1,93%             | \$371.266,49     | 31   | 1,06  | \$392.640,04     |       | \$2.182.717,54    | \$21.388.200,54 |   |
| ) | 30/06/2021 | \$19.205.483,00 | 25,82%     | 1,93%             | \$371.072,00     | 30   | 1,02  | \$379.775,18     |       | \$2.562.492,72    | \$21.767.975,72 |   |
|   | 31/07/2021 | \$19.205.483,00 | 25,77%     | 1,93%             | \$370.488,41     | 31   | 1,06  | \$391.817,17     |       | \$2.954.309,89    | \$22.159.792,89 |   |
| ) | 30/08/2021 | \$19.205.483,00 | 25,86%     | 1,94%             | \$371.655,40     | 30   | 1,02  | \$380.372,26     |       | \$3.334.682,15    | \$22.540.165,15 |   |
|   | 30/09/2021 | \$19.205.483,00 | 25,79%     | 1,93%             | \$370.682,96     | 31   | 1,06  | \$392.022,92     |       | \$3.726.705,07    | \$22.932.188,07 |   |
|   | 31/10/2021 | \$19.205.483,00 | 25,62%     | 1,92%             | \$368.541,74     | 31   | 1,06  | \$389.758,43     |       | \$4.116.463,50    | \$23.321.946,50 |   |
|   | 30/11/2021 | \$19.205.483,00 | 25,91%     | 1,94%             | \$372.238,60     | 30   | 1,02  | \$380.969,15     |       | \$4.497.432,65    | \$23.702.915,65 | • |
|   | 31/12/2021 | \$19.205.483,00 | 26,19%     | 1,96%             | \$375.927,81     | 31   | 1,06  | \$397.569,71     |       | \$4.895.002,35    | \$24.100.485,35 | 4 |
|   | 31/01/2022 | \$19.205.483,00 | 26,49%     | 1,98%             | \$379.802,94     | 31   | 1,06  | \$401.667,93     |       | \$5.296.670,28    | \$24.502.153,28 |   |
|   | 28/02/2022 | \$19.205.483,00 | 27,45%     | 2,04%             | \$392.146,99     | 28   | 0,96  | \$374.588,17     |       | \$5.671.258,44    | \$24.876.741,44 |   |
|   | 28/03/2022 | \$19.205.483,00 | 27,71%     | 2,06%             | \$395.411,55     | 28   | 0,96  | \$377.706,55     |       | \$6.048.965,00    | \$25.254.448,00 |   |

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| Capital            | \$19.205.483,00 |
|--------------------|-----------------|
| Intereses de Plazo | \$1.078.593,00  |
| Intereses Mora     | \$6.048.965,00  |
| Total              | \$25.254.448,00 |

DEMANDANTE: RF ENCÔRE S.A.S CESIONARIO BANCO SCOTIABANK - COLPATRIA

DEMANDADO: OSCAR JAVIER SIERRA RINCON

RADICADO: 2021 - 00232

OBLIGACION CONTENIDA EN EL PAGARE No. 459356000111173275

CAPITAL \$35.484.627,00

| fecha      | capital         | intereses<br>moratorios | interes moratorio<br>mensual | valor de interes | dias | meses | interes causados | pagos | interes acumulado | deuda total     |     |
|------------|-----------------|-------------------------|------------------------------|------------------|------|-------|------------------|-------|-------------------|-----------------|-----|
| 11/12/2020 | \$35.484.627,00 |                         | 1,96%                        | \$694.575,50     |      |       |                  |       |                   |                 |     |
| 31/12/2020 | \$35.484.627,00 | 26,19%                  | 1,96%                        | \$694.575,50     | 20   | 0,68  | \$473.910,79     |       | \$473.910,79      | \$35.958.537,79 |     |
| 31/01/2021 | \$35.484.627,00 | 25,98%                  | 1,94%                        | \$689.554,35     | 31   | 1,06  | \$729.251,51     |       | \$1.203.162,30    | \$36.687.789,30 |     |
| 28/02/2021 | \$35.484.627,00 | 26,31%                  | 1,97%                        | \$697.441,30     | 28   | 0,96  | \$666.212,58     |       | \$1.869.374,88    | \$37.354.001,88 |     |
| 31/03/2021 | \$35.484.627,00 | 26,12%                  | 1,95%                        | \$692.783,11     | 31   | 1,06  | \$732.666,15     |       | \$2.602.041,03    | \$38.086.668,03 | 117 |
| 30/04/2021 | \$35.484.627,00 | 25,97%                  | 1,94%                        | \$689.195,40     | 30   | 1,02  | \$705.359,90     |       | \$3.307.400,93    | \$38.792.027,93 |     |
| 31/05/2021 | \$35.484.627,00 | 25,83%                  | 1,93%                        | \$685.963,11     | 31   | 1,06  | \$725.453,52     |       | \$4.032.854,45    | \$39.517.481.45 |     |
| 30/06/2021 | \$35.484.627,00 | 25,82%                  | 1,93%                        | \$685.603,77     | 30   | 1,02  | \$701.684,03     |       | \$4.734.538,48    | \$40.219.165.48 |     |
| 31/07/2021 | \$35.484.627,00 | 25,77%                  | 1,93%                        | \$684.525,52     | 31   | 1,06  | \$723.933,17     |       | \$5.458.471,65    | \$40.943.098,65 |     |
| 30/08/2021 | \$35.484.627,00 | 25,86%                  | 1,94%                        | \$686.681,67     | 30   | 1,02  | \$702.787,21     |       | \$6.161.258,86    | \$41.645.885.86 |     |
| 30/09/2021 | \$35.484.627,00 | 25,79%                  | 1,93%                        | \$684.884,97     | 31   | 1,06  | \$724.313,32     |       | \$6.885.572,18    | \$42.370.199.18 |     |
| 31/10/2021 | \$35.484.627,00 | 25,62%                  | 1,92%                        | \$680.928,78     | 31   | 1,06  | \$720.129,37     |       | \$7.605.701,55    | \$43.090.328,55 |     |
| 30/11/2021 | \$35.484.627,00 | 25,91%                  | 1,94%                        | \$687.759,22     | 30   | 1,02  | \$703.890,03     |       | \$8.309.591,58    | \$43.794.218,58 |     |
| 31/12/2021 | \$35.484.627,00 | 26,19%                  | 1,96%                        | \$694.575,50     | 31   | 1,06  | \$734.561,73     |       | \$9.044.153,31    | \$44.528.780,31 |     |
| 31/01/2022 | \$35.484.627,00 | 26,49%                  | 1,98%                        | \$701.735,31     | 31   | 1,06  | \$742.133,72     |       | \$9.786.287,03    | \$45.270.914,03 |     |
| 28/02/2022 | \$35.484.627,00 | 27,45%                  | 2,04%                        | \$724.542,55     | 28   | 0,96  | \$692.100,34     |       | \$10.478.387.37   | \$45.963.014,37 |     |
| 28/03/2022 | \$35.484.627,00 | 27,71%                  | 2,06%                        | \$730.574,25     | 28   | 0,96  | \$697.861,97     |       | \$11.176.249,34   | \$46.660.876,34 |     |

29,3125

| Capital            | \$35.484.627,00 |
|--------------------|-----------------|
| Intereses de Plazo | \$2.197.682,00  |
| Intereses Mora     | \$11.176.249,34 |
| Total              | \$46.660.876,34 |