

ENRIQUE PATRON CHAVEZ
ABOGADO TITULADO
UNIVERSIDAD - ATLANTICO
T.P. N° 69055

DIRECCION: CALLE 79B#42f-156 APTO 102 .
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Señor
JUEZ 1º CIVIL DEL CIRCUITO DE SOLEDAD
E. S. D.

REF: ACTUALIZACION DE LIQUIDACION DE CREDITO.
DEMANDANTE: PURA DEL SOCORRO MANOTAS CC.Nº 22.661.999
DEMANDADOS: MUNICIPIO DE PONEDERA Y/O PERSONERIA MUNICIPAL
PROCESO EJECUTIVO LABORAL
RADICACIÓN N° 08758-3103-001-2012-00200-00

ENRIQUE PATRON CHAVEZ, mayor identificado con CCNº 8.678.143 DE BARRANQUILLA,,
Tarjeta Profesional N°69055 DEL C.S.J., abogado en ejercicio, actuando como apoderado de la
demandante, acudo a su Despacho, con el objeto de presentar, escrito de **ACTUALIZACIÓN DE**
LIQUIDACIÓN DEL CREDITO, correspondiente a mi poderdante arriba mencionado

Fundamento mi solicitud, en el Artículo 446 del Nuevo Código General del Proceso.

De usted,

ATENTAMENTE,


ENRIQUE PATRON CHAVEZ
CCNº 8.678.143 DE BARRANQUILLA
T.P. N° 69055 DEL C.S.J.

Anexo () folios

JUZGADO PRIMERO CIVIL DEL CIRCUITO DE SOLEDAD
 DTE: PURA MANOTAS MANOTAS
 DDO: ALCALDIA DE PONEDERA Y/O PERSONERIA MUNICIPAL
 RAD. No. 08758-3103-001-2012-00200-00

LIQUIDACIÓN INTERESES DE MORA

ITEM	CAPITAL	RESOLUCIÓN	PERIODO VENCIDO	TASA INTERES ANUAL EFECTIVO	TASA DE INTERES DE MORA ANUAL EFECTIVO	Mora	DIAS LIQUID.	INTERESES DE MORA MENSUAL
1	97.633.726	1192 (28-06-13)	01 al 31 Jul/13	20,34%	30,51%	2,24%	31	2.263.638
2	97.633.726	1192 (28-06-13)	01 al 31 Ago/13	20,34%	30,51%	2,24%	31	2.263.638
3	97.633.726	1192 (28-06-13)	01 al 30 Sep/13	20,34%	30,51%	2,24%	30	2.190.617
4	97.633.726	1179 (30-09-13)	01 al 31 Oct/13	19,85%	29,78%	2,20%	31	2.215.104
5	97.633.726	1179 (30-09-13)	01 al 30 Nov/13	19,85%	29,78%	2,20%	30	2.143.649
6	97.633.726	1179 (30-09-13)	01 al 31 Dic/13	19,85%	29,78%	2,20%	31	2.215.104
7	97.633.726	2372 (30-12-13)	01 al 31 Ene/14	19,65%	29,48%	2,18%	31	2.195.221
8	97.633.726	2372 (30-12-13)	01 al 28 Feb/14	19,65%	29,48%	2,18%	28	1.982.781
9	97.633.726	2372 (30-12-13)	01 al 31 Mar/14	19,65%	29,48%	2,18%	31	2.195.221
10	97.633.726	0503 (31-03-14)	01 al 30 Abr/14	19,63%	29,45%	2,17%	30	2.122.482
11	97.633.726	0503 (31-03-14)	01 al 31 May/14	19,63%	29,45%	2,17%	31	2.193.231
12	97.633.726	0503 (31-03-14)	01 al 30 Jun/14	19,63%	29,45%	2,17%	30	2.122.482
13	97.633.726	1041 (01-07-14)	01 al 31 Jul/14	19,33%	29,00%	2,14%	31	2.163.322
14	97.633.726	1041 (01-07-14)	01 al 31 Agos/14	19,33%	29,00%	2,14%	31	2.163.322
15	97.633.726	1041 (01-07-14)	01 al 30 Sept/14	19,33%	29,00%	2,14%	30	2.093.537
16	97.633.726	1707 (30-09-14)	01 al 31 Oct/14	19,17%	28,76%	2,13%	31	2.147.331
17	97.633.726	1707 (30-09-14)	01 al 30 Nov/14	19,17%	28,76%	2,13%	30	2.078.063
18	97.633.726	1707 (30-09-14)	01 al 31 Dic/14	19,17%	28,76%	2,13%	31	2.147.331
19	97.633.726	2359 (30-12-14)	01 al 31 Ene/15	19,21%	28,82%	2,13%	31	2.151.332
20	97.633.726	2359 (30-12-14)	01 al 28 Feb/15	19,21%	28,82%	2,13%	28	1.943.138
21	97.633.726	2359 (30-12-14)	01 al 31 Mar/15	19,21%	28,82%	2,13%	31	2.151.332
22	97.633.726	0369 (30-03-15)	01 al 30 Abri/15	19,37%	29,06%	2,15%	30	2.097.402
23	97.633.726	0369 (30-03-15)	01 al 31 May/15	19,37%	29,06%	2,15%	31	2.167.315
24	97.633.726	0369 (30-03-15)	01 al 30 Jun/15	19,37%	29,06%	2,15%	30	2.097.402
25	97.633.726	1341 (29-12-15)	01 al 31 Julio/15	19,23%	28,85%	2,13%	31	2.153.331
26	97.633.726	0913 (25-07-15)	01 al 31 Agos/15	19,26%	28,89%	2,14%	31	2.156.329
27	97.633.726	0913 (25-07-15)	01 al 30 Sep/15	19,26%	28,89%	2,14%	30	2.086.770
28	97.633.726	1341 (29-09-15)	01 al 31 Oct/15	19,33%	29,00%	2,14%	31	2.163.322
29	97.633.726	1341 (29-09-15)	01 al 30 Nov/15	19,33%	29,00%	2,14%	30	2.093.537
30	97.633.726	1341 (29-09-15)	01 al 31 Dic/15	19,33%	29,00%	2,14%	31	2.163.322
31	97.633.726	1788 (28-12-15)	01 al 31 Ene/16	19,68%	29,52%	2,18%	31	2.198.206
32	97.633.726	1788 (28-12-15)	01 al 29 Feb/16	19,68%	29,52%	2,18%	29	2.056.387
33	97.633.726	1788 (28-12-15)	01 al 31 Mar/16	19,68%	29,52%	2,18%	31	2.198.206
34	97.633.726	0334 (29-05-16)	01 al 30 Abri/16	20,54%	30,81%	2,26%	30	2.209.718
35	97.633.726	0334 (29-05-16)	01 al 31 May/16	20,54%	30,81%	2,26%	31	2.283.375
36	97.633.726	0334 (29-05-16)	01 al 30 Junio/16	20,54%	30,81%	2,26%	30	2.209.718
37	97.633.726	0811 (28-06-16)	01 al 31 de Jul/16	21,34%	32,01%	2,34%	31	2.361.914
38	97.633.726	0811 (28-06-16)	01 al 31 de agos/16	21,34%	32,01%	2,34%	31	2.361.914
39	97.633.726	0811 (28-06-16)	01 al 30 de Sep/16	21,34%	32,01%	2,34%	30	2.285.723
40	97.633.726	1233 (29-09-16)	01 al 31 de Oct/16	21,99%	32,99%	2,40%	31	2.425.246
41	97.633.726	1233 (29-09-16)	01 de 30 de Nov/16	21,99%	32,99%	2,40%	30	2.347.012
42	97.633.726	1233 (29-09-16)	01 al 31 Dic/16	21,99%	32,99%	2,40%	31	2.425.246
43	97.633.726	1612 (26-12-16)	01 al 31 Ene/17	22,34%	33,51%	2,44%	31	2.459.172
44	97.633.726	1612 (26-12-16)	01 al 28 Feb/17	22,34%	33,51%	2,44%	28	2.221.187
45	97.633.726	1612 (26-12-16)	01 al 31 Mar/17	22,34%	33,51%	2,44%	31	2.459.172
46	97.633.726	0488 (28-03-17)	01 al 30 Abr/17	22,33%	33,50%	2,44%	30	2.378.907
47	97.633.726	0488 (28-03-17)	01 al 31 Mayo/17	22,33%	33,50%	2,44%	31	2.458.204
48	97.633.726	0488 (28-03-17)	01 al 30 Jun/17	22,33%	33,50%	2,44%	30	2.378.907
49	97.633.726	0907 (30-07-17)	01 al 31 Jul/17	21,98%	32,97%	2,40%	31	2.424.275
50	97.633.726	0907 (30-07-17)	01 al 31 Agos/17	21,98%	32,97%	2,40%	31	2.424.275
51	97.633.726	0907 (30-07-17)	01 al 30 Sept/17	21,98%	32,97%	2,40%	30	2.346.072
52	97.633.726	1298 (29-09-17)	01 al 31 Oct/17	21,15%	31,73%	2,32%	31	2.343.320
53	97.633.726	1298 (29-09-17)	01 al 30 Nov/17	20,96%	31,44%	2,30%	30	2.249.700
54	97.633.726	1298 (29-09-17)	01 al 31 Dic/17	20,77%	31,16%	2,29%	31	2.306.023
55	97.633.726	1890 (28-12-17)	01 al 31 Ene/18	20,69%	31,04%	2,28%	31	2.298.152
56	97.633.726	0131 (31-01-18)	01 al 28 Feb/18	21,01%	31,52%	2,31%	28	2.104.152
57	97.633.726	0259 (28-02-18)	01 al 31 Mar/18	20,68%	31,02%	2,28%	31	2.297.167
58	97.633.726	0398 (28-03-18)	01 al 30 Abr/18	20,48%	30,72%	2,26%	30	2.203.992
59	97.633.726	0527 (27-04-18)	01 al 31 May/18	20,44%	30,66%	2,25%	31	2.273.512
60	97.633.726	0687 (30-05-18)	01 al 30 Jun/18	20,28%	30,42%	2,24%	30	2.184.879

61	97.633.726	0820 (30-06-18)	01 al 31 Jul. /18	20,03%	30,05%	2,21%	31	2.232.962
62	97.633.726	954 (27-07-18)	01 al 31 Agos. /18	19,94%	29,91%	2,20%	31	2.224.037
63	97.633.726	1112 (31-08-18)	01 al 30 Sept. /18	19,81%	29,72%	2,19%	30	2.139.804
64	97.633.726	1294 (28-09-18)	01 al 31 Oct. /18	19,63%	29,45%	2,17%	31	2.193.231
65	97.633.726	1521 (31-10-18)	01 al 30 Nov. /18	19,49%	29,24%	2,16%	30	2.108.986
66	97.633.726	1708 (29-11-18)	01 al 31 Dic. /18	19,40%	29,10%	2,15%	31	2.170.309
67	97.633.726	1872 (27-12-18)	01 al 31 Ene. /19	19,16%	28,74%	2,13%	31	2.146.331
68	97.633.726	111 (31/01/19)	01 al 28 Feb. /19	19,70%	29,55%	2,18%	28	1.987.274
69	97.633.726	263 (26-02-19)	01 al 31 Mar. /19	19,37%	29,06%	2,15%	31	2.167.315
70	97.633.726	0389 (29-03-19)	01 al 30 Abri. /19	19,32%	28,98%	2,14%	30	2.092.571
71	97.633.726	0574 (30-04-19)	01 al 31 Mayo. /19	19,34%	29,01%	2,15%	31	2.164.320
72	97.633.726	0697 (30-05-19)	01 al 30 jun. /19	19,30%	28,95%	2,14%	30	2.090.638
73	97.633.726	0829 (28-06-19)	01 al 31 jull. /19	19,30%	28,95%	2,14%	31	2.160.326
74	97.633.726	1018 (31-07-19)	01 al 31 agosto. /19	19,32%	28,98%	2,14%	31	2.162.323
75	97.633.726	1045 (30-08-19)	01 al 30 Sept. /19	19,32%	28,98%	2,14%	30	2.092.571
76	97.633.726	1293 (30-09-19)	01 al 31 Oct. /19	19,10%	28,65%	2,12%	31	2.140.327
77	97.633.726	1474 (30-10-19)	01 al 30 Nov. /19	19,03%	28,55%	2,11%	30	2.064.500
78	97.633.726	1603 (29-11-19)	01 al 31 Dic. /19	18,91%	28,37%	2,10%	31	2.121.288
79	97.633.726	1768 (27-12-2019)	01 al 31 Ene. /20	18,77%	28,16%	2,09%	31	2.107.235
80	97.633.726	0094 (31-01-20)	01 al 29 Feb. /20	19,06%	28,59%	2,12%	29	1.998.495
81	97.633.726	0205 (27-02-20)	01 al 31 Marz. /20	18,95%	28,43%	2,11%	31	2.125.300
82	97.633.726	0351 (27-03-20)	01 al 30 Abril. /20	18,69%	28,04%	2,08%	30	2.031.479
83	97.633.726	0437 (30-04-20)	01 al 31 Mayo. /20	18,19%	27,29%	2,03%	31	2.048.789
84	97.633.726	0505 (29-05-20)	01 al 30 Junio. /20	18,12%	27,18%	2,02%	30	1.975.848
85	97.633.726	0605 (30-06-20)	01 al 31 Julio. /20	18,12%	27,18%	2,02%	31	2.041.710
86	97.633.726	0685 (31-07-20)	01 al 31 Agosto. /20	18,29%	27,44%	2,04%	31	2.058.892
87	97.633.726	0769 (28-08-20)	01 al 30 Sept. /20	18,35%	27,53%	2,05%	31	2.064.948
88	97.633.726	0869 (30-09-20)	01 al 30 Oct. /20	18,09%	27,14%	2,02%	31	2.038.675
89	97.633.726	0947 (29-10-20)	01 al 30 Nov. /20	17,84%	26,76%	2,00%	30	1.948.395
90	97.633.726	1034 (26-11-20)	01 al 31 Dic. /20	17,46%	26,19%	1,96%	31	1.974.704
91	97.633.726	1215 (30-12-21)	01 al 31 Ene. /21	17,32%	25,98%	1,94%	31	1.960.429
92	97.633.726	0064 (29-01-21)	01 al 28 Feb. /21	17,32%	25,98%	1,94%	28	1.770.710
93	97.633.726	0161 (26-02-21)	01 al 31 Mar. /21	17,41%	26,12%	1,95%	31	1.969.608
94	97.633.726	0305 (31-03-21)	01 al 30 Abril. /21	17,31%	25,97%	1,94%	30	1.896.201
95	97.633.726	0407 (30-04-21)	01 al 31 Mayo. /21	17,22%	25,83%	1,93%	30	1.887.308
96	97.633.726	0509 (28-05-21)	01 al 30 Junio. /21	17,22%	25,83%	1,93%	31	1.950.219
97	97.633.726	0622 (30-06-21)	01 al 31 Julio. /21	17,18%	25,77%	1,93%	31	1.946.131
98	97.633.726	0804 (30-07-21)	01 al 31 agosto. /21	17,24%	25,86%	1,94%	31	1.952.261
99	97.633.726	0931 (30-08-21)	01 al 30 sept. /21	17,19%	25,79%	1,93%	30	1.884.342
100	97.633.726	1095 (30-09-21)	01 al 13 Oct. /21	17,08%	25,62%	1,92%	30	1.873.457
101	97.633.726	1259 (29-10-21)	01 al 30 Nov. /21	17,27%	25,91%	1,94%	30	1.892.250
102	97.633.726	1405 (30-11-21)	01 al 31 Dic. /21	17,46%	26,19%	1,96%	30	1.911.004
103	97.633.726	1597 (30-12-22)	01 al 31 Ene. /22	17,66%	26,49%	1,98%	30	1.930.703
104	97.633.726	0143 (28-01-22)	01 al 28 Feb. /22	18,30%	27,45%	2,04%	28	1.860.556
105	97.633.726	0056 (25-02-22)	01 al 31 Mar. /22	18,30%	27,45%	2,04%	31	2.059.901
106	97.633.726	0382 (31-03-22)	01 al 27 Abril. /22	19,05%	28,58%	2,12%	27	1.859.795
TOTAL CAPITAL								97.633.726
TOTAL INTERES DE MORA								226.972.794
TOTAL LIQUIDACION DEL CREDITO								324.606.520

Enrique Saffari Ch
c.c. N. 8678143
f.p. N. 69055 del C.S.F.