

**MEMORIAL CAUTELARES Y LIQUIDACION DEL CREDITO EJECUTIVO 2017 00110**

javier alfonso moros acosta <javiermoros11@hotmail.com>

Mié 22/09/2021 3:41 PM

Para: Juzgado 01 Laboral Circuito - Meta - Villavicencio <lab01vcio@cendoj.ramajudicial.gov.co>

 2 archivos adjuntos (196 KB)

MEMORIAL SOLICITUD OFICIAR Y MEDIDAS CAUTELARES (EJE LAB 2017 00110).pdf; LIQUIDACION CREDITO ORLANDO GUTIERRES (EJ LABORAL 2017 00110).pdf;

*CORDIAL SALUDO EN MI CALIDAD DE APODERADO DEL EJECUTANTE ENVIO DOS MEMORIALES UNO CON LA LIQUIDACION DEL CREDITO Y OTRO CON SOLICITUD MEDIDAS CAUTELARES.*

*Att.*

**JAVIER ALFONSO MOROS ACOSTA**  
**C.C. No. 11.410.196 de Cáqueza**  
**T.P. No. 173.005 del C.S.J.**  
**CEL. 311 8538589**  
**E-MAIL. [javiermoros11@hotmail.com](mailto:javiermoros11@hotmail.com)**



ACOR LTDA.

JAVIER ALFONSO MOROS ACOSTA<sup>1</sup>

Abogado

SEÑOR

JUEZ PRIMERO LABORAL DEL CIRCUITO DE VILLAVICENCIO

E. S. D.

REF: DEMANDA EJECUTIVO LABORAL DE ORLANDO GUTIERREZ ALVAREZ contra TORRES CASTRO Y JAIMES VARGAS S EN C.S.  
MEMORIAL LIQUIDACION DEL CREDITO  
No. 50001310500120170011000

JAVIER ALFONSO MOROS ACOSTA, mayor de edad, domiciliado y residente en Villavicencio (Meta), identificado con la cédula de ciudadanía N° 11.410.196 de Cáqueza (Cundinamarca), abogado en ejercicio con tarjeta profesional N° 173.005 del C.S.J., obrando en mi calidad de apoderado del señor **ORLANDO GUTIERREZ ALVAREZ**, mayor de edad, con domicilio en Villavicencio (Meta), identificado con la C. C. No. 11.407.652 de Cáqueza (Cundinamarca), al señor juez respetuosamente le manifiesto que adjunto a la presente la liquidación del crédito de la referencia, así:

| LIQUIDACION EJECUTIVO LABORAL 2017-00110 |            |         | CAPITAL         |
|------------------------------------------|------------|---------|-----------------|
| DESDE                                    | HASTA      | INTERES | \$ 201.369.396  |
| 16-jul-16                                | 30-jul-16  | 32,01%  | \$ 2.506.713,36 |
| 1-ago-16                                 | 30-ago-16  | 32,01%  | \$ 5.371.528,64 |
| 1-sep-16                                 | 30-sep-16  | 32,01%  | \$ 5.371.528,64 |
| 1-oct-16                                 | 30-oct-16  | 32,99%  | \$ 5.535.980,31 |
| 1-nov-16                                 | 30-nov-16  | 32,99%  | \$ 5.535.980,31 |
| 1-dic-16                                 | 30-dic-16  | 32,99%  | \$ 5.535.980,31 |
| 1-ene-17                                 | 30-ene-17  | 33,51%  | \$ 5.623.240,38 |
| 1-feb-17                                 | 28-feb-17  | 33,51%  | \$ 5.623.240,38 |
| 1-mar-17                                 | 30-mar-17  | 33,51%  | \$ 5.623.240,38 |
| 1-abr-17                                 | 30-abr-17  | 33,50%  | \$ 5.621.562,31 |
| 1-may-17                                 | 30-may-17  | 33,50%  | \$ 5.621.562,31 |
| 1-jun-17                                 | 30-jun-17  | 33,50%  | \$ 5.621.562,31 |
| 1-jul-17                                 | 30-jul-17  | 32,97%  | \$ 5.532.624,16 |
| 1-ago-17                                 | 30-ago-17  | 32,97%  | \$ 5.532.624,16 |
| 1-sep-17                                 | 30-sep-17  | 32,22%  | \$ 5.406.768,28 |
| 1-oct-17                                 | 30-oct-17  | 31,73%  | \$ 5.324.542,45 |
| 1-nov-17                                 | 30-nov-17  | 31,44%  | \$ 5.275.878,18 |
| 1-dic-17                                 | 31-dic-17  | 31,16%  | \$ 5.228.891,98 |
| 1-ene-18                                 | 31-ene-18  | 31,04%  | \$ 5.208.755,04 |
| 1-feb-18                                 | 28-feb-18  | 31,52%  | \$ 5.289.302,80 |
| 1-mar-18                                 | 31-mar-18  | 31,02%  | \$ 5.205.398,89 |
| 1-abr-18                                 | 31/04/2018 | 30,72%  | \$ 5.155.056,54 |
| 1-may-18                                 | 31-may-18  | 30,66%  | \$ 5.144.988,07 |
| 1-jun-18                                 | 31/06/2018 | 30,42%  | \$ 5.104.714,19 |
| 1-jul-18                                 | 31-jul-18  | 30,05%  | \$ 5.042.625,29 |
| 1-ago-18                                 | 31-ago-18  | 29,91%  | \$ 5.019.132,20 |
| 1-sep-18                                 | 30-sep-18  | 29,72%  | \$ 4.986.409,67 |
| 1-oct-18                                 | 31-oct-18  | 29,45%  | \$ 4.941.940,59 |
| 1-nov-18                                 | 30-nov-18  | 29,24%  | \$ 4.906.700,95 |
| 1-dic-18                                 | 31-dic-18  | 29,10%  | \$ 4.883.207,85 |
| 1-ene-19                                 | 31-ene-19  | 28,74%  | \$ 4.822.797,03 |
| 1-feb-19                                 | 28-feb-19  | 29,55%  | \$ 4.958.721,38 |
| 1-mar-19                                 | 31-mar-19  | 29,06%  | \$ 4.876.495,54 |
| 1-abr-19                                 | 30-abr-19  | 28,98%  | \$ 4.863.070,91 |
| 1-may-19                                 | 31-may-19  | 29,01%  | \$ 4.868.105,15 |
| 1-jun-19                                 | 30-jun-19  | 28,95%  | \$ 4.858.036,68 |
| 1-jul-19                                 | 31-jul-19  | 28,92%  | \$ 4.853.002,44 |
| 1-ago-19                                 | 31-ago-19  | 28,98%  | \$ 4.863.070,91 |

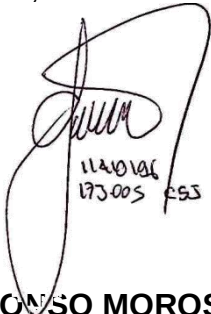
Calle 13 No. 8 - 39 Of. 703 Bogotá D.C.  
TELEFAX: (8) 6735618  
CELULAR: 311 853 85 89

Cra. 35 No. 34 B - 37 Of. 201 Villavicencio  
TELEFAX: (8) 6735618  
E-MAIL: javiermoros11@hotmail.com

|                       |            |        |    |                |
|-----------------------|------------|--------|----|----------------|
| 1-sep-19              | 30-sep-19  | 28,98% | \$ | 4.863.070,91   |
| 1-oct-19              | 31-oct-19  | 28,65% | \$ | 4.807.694,33   |
| 1-nov-19              | 30-nov-19  | 28,55% | \$ | 4.790.913,55   |
| 1-dic-19              | 31-dic-19  | 28,37% | \$ | 4.760.708,14   |
| 1-ene-20              | 31-ene-20  | 28,16% | \$ | 4.725.468,49   |
| 1-feb-20              | 29-feb-20  | 28,59% | \$ | 4.797.625,86   |
| 1-mar-20              | 31-mar-20  | 28,43% | \$ | 4.770.776,61   |
| 1-abr-20              | 30-abr-20  | 28,04% | \$ | 4.705.331,55   |
| 1-may-20              | 31-may-20  | 27,29% | \$ | 4.579.475,68   |
| 1-jun-20              | 30-jun-20  | 27,18% | \$ | 4.561.016,82   |
| 1-jul-20              | 31-jul-20  | 27,18% | \$ | 4.561.016,82   |
| 1-ago-20              | 31-ago-20  | 27,44% | \$ | 4.604.646,86   |
| 1-sep-20              | 31/09/2020 | 27,53% | \$ | 4.619.749,56   |
| 1-oct-20              | 31-oct-20  | 27,14% | \$ | 4.554.304,51   |
| 1-nov-20              | 31/11/2020 | 26,76% | \$ | 4.490.537,53   |
| 1-dic-20              | 31-dic-20  | 26,19% | \$ | 4.394.887,07   |
| 1-ene-21              | 31-ene-21  | 25,98% | \$ | 4.359.647,42   |
| 1-feb-21              | 28-feb-21  | 26,31% | \$ | 4.415.024,01   |
| 1-mar-21              | 31-mar-21  | 26,12% | \$ | 4.383.140,52   |
| 0122/04/2021          | 30-abr-21  | 25,97% | \$ | 4.357.969,35   |
| 1-may-21              | 31-may-21  | 25,83% | \$ | 4.334.476,25   |
| 1-jun-21              | 30-jun-21  | 25,82% | \$ | 4.332.798,17   |
| 1-jul-21              | 30-jul-21  | 25,77% | \$ | 4.324.407,78   |
| 1-ago-21              | 30-ago-21  | 25,86% | \$ | 4.339.510,48   |
| 1-sep-21              | 30-sep-21  | 25,79% | \$ | 4.327.763,94   |
| SUMAN INTERESES       |            |        | \$ | 309.506.943,15 |
| CAPITAL MAS INTERESES |            |        | \$ | 510.876.339,15 |

Ruego a su señoría una vez se corra el respectivo traslado de se sirva impartirle aprobación a la anterior liquidación del crédito.

Del Señor Juez, Atentamente,



11410196  
173.005 C.S.J.

JAVIER ALFONSO MOROS ACOSTA  
C.C. No. 11.410.196 de Cáqueza (cundí)  
T.P. No. 173.005 del C.S.J.  
Celular 311 8538589.  
E-mail: [javiermoros11@hotmail.com](mailto:javiermoros11@hotmail.com)