

SOLICITUD ACTUALIZACION DE LA LIQUIDACION DEL CREDITO

Andrea Marcela Torné Zúñiga <andreatorne@hotmail.com>

Lun 19/12/2022 11:54 AM

Para:

- Juzgado 04 Civil Municipal - Atlántico - Soledad <j04cmpalsoledad@cendoj.ramajudicial.gov.co>

CC:

- freddy ramirez <notificaciones@comsel.com.co>

Señor

Juez Cuarto Civil Municipal de Soledad.

E.S.D.

De: COOPERATIVA MULTIACTIVA DE SERVICIOS LEGALES “COMSEL”

Contra: MEREDITH PEREZ MONTES Y OTROS .

Rad: 2018 - 69

ANDREA MARCELA TORNE ZUÑIGA, apoderada de la parte demandante, me permito presenta por medio de este correo electrónico memorial solicitando actualización de la liquidación del credito.

ANEXOS

1. Se adjunta a este correo electrónico PDF del memorial y de los respectivos anexos

ANDREA TORNE ZUÑIGA
Abogada Universidad Libre
Seccional Barranquilla

Señor
Juez Cuarto Civil Municipal de Soledad
E.S.D.

De: COOPERATIVA MULTIACTIVA DE SERVICIOS LEGALES "COMSEL"
Contra: MEREDITH PEREZ MONTES Y OTROS

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SOLICITUD ACTUALIZACION DE LA LIQUIDACION DEL CREDITO

ANDREA MARCELA TORNE ZUÑIGA, mayor de edad, domiciliado(a) y residente en la ciudad de Barranquilla, Atlántico, identificado(a) como aparece al pie de mi firma, abogado(a) titulado(a) en ejercicio, portador(a) de la Tarjeta Profesional No 227914 del Consejo Superior de la Judicatura, obrando en mi condición de apoderada, de la **COOPERATIVA MULTIACTIVA DE SERVICIOS LEGALES COMSEL**, me permito solicitar se surtan los tramites conducentes para aporbar la presente actualización de la liquidación del crédito:

SALDO ACTUAL.....	\$57.686.792
INTERESES MORATORIO.....	\$16.780.960
TOTAL.....	\$74.467.752

Se hace la observación quela presente actualización no se le ha practicado lo liquidado por el juzgado en costas, ya que las costas al ser un valor accesorio al proceso debe ser lo ultimo a practicar, por ende hay que sumarle a los valores anterior lo liquidado en costas.

Atentamente

ANDREA MARCELA TORNE ZUÑIGA
C.C. No. 1.140.815.609
T.P. No. 227914 del Consejo Superior de la Judicatura

FECHA PRESENTACION DEMANDA	09/05/2019
FECHA LIQUIDACION	31/12/2022
VALOR PRETENSION	\$57.686.792

SALDO FINAL	\$57.686.792
INTERES MORATORIO	\$16.780.960
SALDO OBLIGACION	\$74.467.752

COSTAS	\$4.052.075
DESCUENTO	\$0
SALDO TOTAL	\$78.519.827

33171235 MEREDITH PEREZ MONTES

FECHA	TASA EA	TASA NM	SALDO INICIAL	INTERES	INTERES ACUMULADO	APORTE	APORTE A CAPITAL	SALDO FINAL
09/05/2019			\$57.686.792	\$19.209.189	\$19.209.189			\$57.686.792
31/05/2019	29,01%	2,1454%	\$57.686.792	\$904.990	\$20.114.179	\$0	\$0	\$57.686.792
30/06/2019	28,95%	2,1414%	\$57.686.792	\$1.235.302	\$21.349.481	\$0	\$0	\$57.686.792
28/01/2019	28,92%	2,1394%	\$57.686.792	\$0	\$20.858.970	\$490.511	\$0	\$57.686.792
26/02/2019	28,92%	2,1394%	\$57.686.792	\$1.192.598	\$21.561.057	\$490.511	\$0	\$57.686.792
27/03/2019	28,92%	2,1394%	\$57.686.792	\$1.192.598	\$22.263.144	\$490.511	\$0	\$57.686.792
26/04/2019	28,92%	2,1394%	\$57.686.792	\$1.234.159	\$23.006.792	\$490.511	\$0	\$57.686.792
28/05/2019	28,92%	2,1394%	\$57.686.792	\$1.317.369	\$23.833.650	\$490.511	\$0	\$57.686.792
26/06/2019	28,92%	2,1394%	\$57.686.792	\$1.192.598	\$23.978.306	\$1.047.942	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$531.597	\$23.494.241	\$1.015.662	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$22.273.152	\$1.221.089	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$21.159.420	\$1.113.732	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$20.573.297	\$586.123	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$19.423.598	\$1.149.699	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$18.948.187	\$475.411	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$18.472.776	\$475.411	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$17.997.365	\$475.411	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$17.521.954	\$475.411	\$0	\$57.686.792
09/07/2019	28,92%	2,1394%	\$57.686.792	\$0	\$17.046.543	\$475.411	\$0	\$57.686.792
24/07/2019	28,92%	2,1394%	\$57.686.792	\$613.814	\$16.849.197	\$811.160	\$0	\$57.686.792
26/07/2019	28,92%	2,1394%	\$57.686.792	\$81.467	\$16.440.153	\$490.511	\$0	\$57.686.792
31/07/2019	28,92%	2,1394%	\$57.686.792	\$203.884	\$16.644.037	\$0	\$0	\$57.686.792
27/08/2019	28,98%	2,1434%	\$57.686.792	\$1.111.616	\$17.265.142	\$490.511	\$0	\$57.686.792
31/08/2019	28,98%	2,1434%	\$57.686.792	\$163.349	\$17.428.491	\$0	\$0	\$57.686.792
26/09/2019	28,98%	2,1434%	\$57.686.792	\$1.070.066	\$18.008.046	\$490.511	\$0	\$57.686.792
30/09/2019	28,98%	2,1434%	\$57.686.792	\$163.349	\$18.171.395	\$0	\$0	\$57.686.792
28/10/2019	28,65%	2,1216%	\$57.686.792	\$1.141.473	\$18.822.357	\$490.511	\$0	\$57.686.792
31/10/2019	28,65%	2,1216%	\$57.686.792	\$121.234	\$18.943.591	\$0	\$0	\$57.686.792
26/11/2019	28,55%	2,1150%	\$57.686.792	\$1.055.897	\$18.951.546	\$1.047.942	\$0	\$57.686.792
30/11/2019	28,55%	2,1150%	\$57.686.792	\$161.202	\$19.112.748	\$0	\$0	\$57.686.792
26/12/2019	28,37%	2,1030%	\$57.686.792	\$1.049.952	\$19.672.189	\$490.511	\$0	\$57.686.792
31/12/2019	28,37%	2,1030%	\$57.686.792	\$200.446	\$19.872.635	\$0	\$0	\$57.686.792
28/01/2020	28,16%	2,0891%	\$57.686.792	\$1.124.015	\$20.475.917	\$520.733	\$0	\$57.686.792
31/01/2020	28,16%	2,0891%	\$57.686.792	\$119.396	\$20.595.313	\$0	\$0	\$57.686.792
29/02/2020	28,59%	2,1176%	\$57.686.792	\$1.180.443	\$21.775.756	\$0	\$0	\$57.686.792
31/03/2020	28,43%	2,1070%	\$57.686.792	\$1.256.418	\$23.032.174	\$0	\$0	\$57.686.792
30/04/2020	28,04%	2,0811%	\$57.686.792	\$1.200.538	\$24.232.712	\$0	\$0	\$57.686.792
31/05/2020	27,29%	2,0312%	\$57.686.792	\$1.211.180	\$25.443.892	\$0	\$0	\$57.686.792
30/06/2020	27,18%	2,0238%	\$57.686.792	\$1.167.476	\$26.611.368	\$0	\$0	\$57.686.792
09/07/2020	27,18%	2,0238%	\$57.686.792	\$347.790	\$26.135.323	\$823.835	\$0	\$57.686.792
09/07/2020	27,18%	2,0238%	\$57.686.792	\$0	\$25.614.590	\$520.733	\$0	\$57.686.792
09/07/2020	27,18%	2,0238%	\$57.686.792	\$0	\$25.093.857	\$520.733	\$0	\$57.686.792
09/07/2020	27,18%	2,0238%	\$57.686.792	\$0	\$24.573.124	\$520.733	\$0	\$57.686.792
09/07/2020	27,18%	2,0238%	\$57.686.792	\$0	\$24.052.391	\$520.733	\$0	\$57.686.792
31/07/2020	27,18%	2,0238%	\$57.686.792	\$853.858	\$24.906.249	\$0	\$0	\$57.686.792
25/08/2020	27,44%	2,0412%	\$57.686.792	\$979.588	\$24.786.491	\$1.099.346	\$0	\$57.686.792
25/08/2020	27,44%	2,0412%	\$57.686.792	\$0	\$23.962.656	\$823.835	\$0	\$57.686.792

25/08/2020	27,44%	2,0412%	\$57.686.792	\$0	\$23.138.821	\$823.835	\$0	\$57.686.792
25/08/2020	27,44%	2,0412%	\$57.686.792	\$0	\$22.618.088	\$520.733	\$0	\$57.686.792
31/08/2020	27,44%	2,0412%	\$57.686.792	\$233.599	\$22.851.687	\$0	\$0	\$57.686.792
30/09/2020	27,53%	2,0472%	\$57.686.792	\$1.180.956	\$24.032.643	\$0	\$0	\$57.686.792
15/10/2020	27,14%	2,0211%	\$57.686.792	\$580.050	\$23.788.858	\$823.835	\$0	\$57.686.792
15/10/2020	27,14%	2,0211%	\$57.686.792	\$0	\$23.268.125	\$520.733	\$0	\$57.686.792
15/10/2020	27,14%	2,0211%	\$57.686.792	\$0	\$22.444.290	\$823.835	\$0	\$57.686.792
31/10/2020	27,14%	2,0211%	\$57.686.792	\$618.927	\$23.063.217	\$0	\$0	\$57.686.792
05/11/2020	26,76%	1,9957%	\$57.686.792	\$190.300	\$22.429.682	\$823.835	\$0	\$57.686.792
05/11/2020	26,76%	1,9957%	\$57.686.792	\$0	\$21.908.949	\$520.733	\$0	\$57.686.792
05/11/2020	26,76%	1,9957%	\$57.686.792	\$0	\$21.388.216	\$520.733	\$0	\$57.686.792
30/11/2020	26,76%	1,9957%	\$57.686.792	\$957.795	\$22.346.011	\$0	\$0	\$57.686.792
11/12/2020	26,19%	1,9574%	\$57.686.792	\$411.487	\$21.933.663	\$823.835	\$0	\$57.686.792
11/12/2020	26,19%	1,9574%	\$57.686.792	\$0	\$20.834.317	\$1.099.346	\$0	\$57.686.792
18/12/2020	26,19%	1,9574%	\$57.686.792	\$261.517	\$20.271.999	\$823.835	\$0	\$57.686.792
31/12/2020	26,19%	1,9574%	\$57.686.792	\$486.617	\$20.758.616	\$0	\$0	\$57.686.792
31/01/2021	25,98%	1,9432%	\$57.686.792	\$1.158.737	\$21.917.353	\$0	\$0	\$57.686.792
28/02/2021	26,31%	1,9655%	\$57.686.792	\$1.057.543	\$22.974.896	\$0	\$0	\$57.686.792
31/03/2021	26,12%	1,9527%	\$57.686.792	\$1.164.366	\$24.139.262	\$0	\$0	\$57.686.792
22/04/2021	25,97%	1,9426%	\$57.686.792	\$819.669	\$24.438.198	\$520.733	\$0	\$57.686.792
22/04/2021	25,97%	1,9426%	\$57.686.792	\$0	\$23.614.363	\$823.835	\$0	\$57.686.792
30/04/2021	25,97%	1,9426%	\$57.686.792	\$296.725	\$23.911.088	\$0	\$0	\$57.686.792
04/05/2021	25,83%	1,9331%	\$57.686.792	\$147.458	\$23.221.448	\$837.098	\$0	\$57.686.792
04/05/2021	25,83%	1,9331%	\$57.686.792	\$0	\$22.692.319	\$529.129	\$0	\$57.686.792
04/05/2021	25,83%	1,9331%	\$57.686.792	\$0	\$22.163.190	\$529.129	\$0	\$57.686.792
04/05/2021	25,83%	1,9331%	\$57.686.792	\$0	\$21.339.355	\$823.835	\$0	\$57.686.792
04/05/2021	25,83%	1,9331%	\$57.686.792	\$0	\$20.488.993	\$850.362	\$0	\$57.686.792
04/05/2021	25,83%	1,9331%	\$57.686.792	\$0	\$19.959.864	\$529.129	\$0	\$57.686.792
31/05/2021	25,83%	1,9331%	\$57.686.792	\$1.002.681	\$20.962.545	\$0	\$0	\$57.686.792
09/06/2021	25,82%	1,9325%	\$57.686.792	\$332.194	\$20.765.610	\$529.129	\$0	\$57.686.792
09/06/2021	25,82%	1,9325%	\$57.686.792	\$0	\$19.928.512	\$837.098	\$0	\$57.686.792
09/06/2021	25,82%	1,9325%	\$57.686.792	\$0	\$19.399.383	\$529.129	\$0	\$57.686.792
30/06/2021	25,82%	1,9325%	\$57.686.792	\$778.096	\$20.177.479	\$0	\$0	\$57.686.792
21/07/2021	25,77%	1,9291%	\$57.686.792	\$776.741	\$20.117.122	\$837.098	\$0	\$57.686.792
21/07/2021	25,77%	1,9291%	\$57.686.792	\$0	\$19.000.064	\$1.117.058	\$0	\$57.686.792
31/07/2021	25,77%	1,9291%	\$57.686.792	\$368.581	\$19.368.645	\$0	\$0	\$57.686.792
23/08/2021	25,86%	1,9352%	\$57.686.792	\$853.935	\$19.385.482	\$837.098	\$0	\$57.686.792
23/08/2021	25,86%	1,9352%	\$57.686.792	\$0	\$18.856.353	\$529.129	\$0	\$57.686.792
23/08/2021	25,86%	1,9352%	\$57.686.792	\$0	\$18.019.255	\$837.098	\$0	\$57.686.792
31/08/2021	25,86%	1,9352%	\$57.686.792	\$295.599	\$18.314.854	\$0	\$0	\$57.686.792
30/09/2021	25,79%	1,9304%	\$57.686.792	\$1.113.602	\$18.899.327	\$529.129	\$0	\$57.686.792
30/09/2021	25,79%	1,9304%	\$57.686.792	\$0	\$18.062.229	\$837.098	\$0	\$57.686.792
30/09/2021	25,79%	1,9304%	\$57.686.792	\$0	\$17.225.131	\$837.098	\$0	\$57.686.792
30/09/2021	25,79%	1,9304%	\$57.686.792	\$0	\$17.225.131	\$0	\$0	\$57.686.792
31/10/2021	25,62%	1,9189%	\$57.686.792	\$1.144.238	\$18.369.369	\$0	\$0	\$57.686.792
02/11/2021	25,91%	1,9385%	\$57.686.792	\$73.886	\$17.914.126	\$529.129	\$0	\$57.686.792
23/11/2021	25,91%	1,9385%	\$57.686.792	\$780.535	\$18.165.532	\$529.129	\$0	\$57.686.792
23/11/2021	25,91%	1,9385%	\$57.686.792	\$0	\$17.328.434	\$837.098	\$0	\$57.686.792
30/11/2021	25,91%	1,9385%	\$57.686.792	\$259.014	\$17.587.448	\$0	\$0	\$57.686.792
17/12/2021	26,19%	1,9574%	\$57.686.792	\$637.169	\$17.387.519	\$837.098	\$0	\$57.686.792
17/12/2021	26,19%	1,9574%	\$57.686.792	\$0	\$16.270.461	\$1.117.058	\$0	\$57.686.792
31/12/2021	26,19%	1,9574%	\$57.686.792	\$524.219	\$16.794.680	\$0	\$0	\$57.686.792
31/01/2022	26,49%	1,9776%	\$57.686.792	\$1.179.213	\$17.444.764	\$529.129	\$0	\$57.686.792
31/01/2022	26,49%	1,9776%	\$57.686.792	\$0	\$16.607.666	\$837.098	\$0	\$57.686.792
31/01/2022	26,49%	1,9776%	\$57.686.792	\$0	\$16.607.666	\$0	\$0	\$57.686.792
28/02/2022	27,45%	2,0418%	\$57.686.792	\$1.098.610	\$17.706.276	\$0	\$0	\$57.686.792
31/03/2022	27,71%	2,0592%	\$57.686.792	\$1.227.890	\$18.934.166	\$0	\$0	\$57.686.792
04/04/2022	28,58%	2,1169%	\$57.686.792	\$161.352	\$18.164.330	\$931.188	\$0	\$57.686.792
04/04/2022	28,58%	2,1169%	\$57.686.792	\$0	\$17.605.480	\$558.850	\$0	\$57.686.792
25/04/2022	28,58%	2,1169%	\$57.686.792	\$852.146	\$17.573.483	\$884.143	\$0	\$57.686.792
30/04/2022	28,58%	2,1169%	\$57.686.792	\$201.760	\$17.775.243	\$0	\$0	\$57.686.792

31/05/2022	29,57%	2,1822%	\$57.686.792	\$1.301.290	\$18.517.683	\$558.850	\$0	\$57.686.792
31/05/2022	29,57%	2,1822%	\$57.686.792	\$0	\$17.633.540	\$884.143	\$0	\$57.686.792
31/05/2022	29,57%	2,1822%	\$57.686.792	\$0	\$17.633.540	\$0	\$0	\$57.686.792
30/06/2022	30,60%	2,2497%	\$57.686.792	\$1.297.765	\$18.372.455	\$558.850	\$0	\$57.686.792
30/06/2022	30,60%	2,2497%	\$57.686.792	\$0	\$17.488.312	\$884.143	\$0	\$57.686.792
30/06/2022	30,60%	2,2497%	\$57.686.792	\$0	\$17.488.312	\$0	\$0	\$57.686.792
29/07/2022	31,92%	2,3354%	\$57.686.792	\$1.301.807	\$17.610.299	\$1.179.820	\$0	\$57.686.792
29/07/2022	31,92%	2,3354%	\$57.686.792	\$0	\$16.726.156	\$884.143	\$0	\$57.686.792
31/07/2022	31,92%	2,3354%	\$57.686.792	\$88.851	\$16.815.007	\$0	\$0	\$57.686.792
22/08/2022	33,32%	2,4255%	\$57.686.792	\$1.022.776	\$17.278.933	\$558.850	\$0	\$57.686.792
22/08/2022	33,32%	2,4255%	\$57.686.792	\$0	\$16.394.790	\$884.143	\$0	\$57.686.792
31/08/2022	33,32%	2,4255%	\$57.686.792	\$416.237	\$16.811.027	\$0	\$0	\$57.686.792
27/09/2022	35,25%	2,5482%	\$57.686.792	\$1.321.316	\$17.573.493	\$558.850	\$0	\$57.686.792
27/09/2022	35,25%	2,5482%	\$57.686.792	\$0	\$16.689.350	\$884.143	\$0	\$57.686.792
30/09/2022	35,25%	2,5482%	\$57.686.792	\$145.340	\$16.834.690	\$0	\$0	\$57.686.792
27/10/2022	36,92%	2,6531%	\$57.686.792	\$1.375.651	\$17.326.198	\$884.143	\$0	\$57.686.792
27/10/2022	36,92%	2,6531%	\$57.686.792	\$0	\$16.767.348	\$558.850	\$0	\$57.686.792
31/10/2022	36,92%	2,6531%	\$57.686.792	\$201.761	\$16.969.109	\$0	\$0	\$57.686.792
18/11/2022	38,67%	2,7618%	\$57.686.792	\$950.718	\$17.360.977	\$558.850	\$0	\$57.686.792
18/11/2022	38,67%	2,7618%	\$57.686.792	\$0	\$16.476.834	\$884.143	\$0	\$57.686.792
30/11/2022	38,67%	2,7618%	\$57.686.792	\$632.084	\$17.108.918	\$0	\$0	\$57.686.792
14/12/2022	41,46%	2,9326%	\$57.686.792	\$783.379	\$16.712.477	\$1.179.820	\$0	\$57.686.792
14/12/2022	41,46%	2,9326%	\$57.686.792	\$0	\$15.828.334	\$884.143	\$0	\$57.686.792
31/12/2022	41,46%	2,9326%	\$57.686.792	\$952.626	\$16.780.960	\$0	\$0	\$57.686.792