

Señores,

**JUZGADO TERCERO CIVIL MUNICIPAL  
ARCHIPIÉLAGO DE SAN ANDRÉS PROVIDENCIA Y SANTA CATALINA**

**REF. PROCESO VERBAL**

**DEMANDANTE:** LIBERTY SEGUROS S.A.

**DEMANDADO:** HOWARD Y CIA S. EN C.S.

**RAD: 88001400300320180011900**

**REF: MEMORIAL APORTANDO LIQUIDACIÓN DEL CRÉDITO PROCESO  
RADICADO 88001400300320180011900**

**ALEXANDER GOMEZ PEREZ**, varón, mayor de edad, vecino de la ciudad Barranquilla, identificado con la cédula de ciudadanía No. 1.129.566.574 expedida en Barranquilla, abogado titulado y en ejercicio, portador de la tarjeta profesional No. 185.144 del Consejo Superior de la Judicatura, obrando en mi calidad de apoderado Judicial de la compañía **LIBERTY SEGUROS S.A.**, por medio del presente escrito, concurre ante su Despacho con el propósito de allegar liquidación del crédito del proceso de la referencia.

De igual forma, aprovecho la oportunidad para dejar claro al despacho, que, la suscrita **ÚNICAMENTE** recibirá notificaciones en la siguiente dirección de correo electrónico: [agomez@ompabogados.com](mailto:agomez@ompabogados.com), el cual se encuentra actualizado en el REGISTRO NACIONAL DE ABOGADOS, de igual forma ratifico que mi dirección para correspondencia física es en la carrera 58 No. 70 -110 oficina B-4, segundo piso, de la ciudad de Barranquilla, teléfonos (5) 3606945 – 3135119267 – 3106322829 o 3215442599.

Del Señor Juez, atentamente,



**ALEXANDER GOMEZ PEREZ**  
**C.C. No. 1129.566.574 de Barranquilla**  
**T.P. No. 185.144 del C.S.J.**

# LIQUIDACIÓN DE CREDITO:

CAPITAL \$54.994.804

|        |           | VIGENCIA  | INTERES ANUAL |             |              |        | VALOR INTERES DE MORA |      |                |
|--------|-----------|-----------|---------------|-------------|--------------|--------|-----------------------|------|----------------|
| R/CION | FECHA     | DESDE     | HASTA         | B.CORRIENTE | C.ORDINARIOS | # DIAS | T.M LEGAL             | %    |                |
| 0334   | 29-mar-16 | 08-abr-16 | 30-jun-16     | 20,54       | .....        | 83     | 30,81                 | 7,10 | \$3.906.510,07 |
| 0811   | 28-jun-16 | 01-jul-16 | 30-sep-16     | 21,34       | .....        | 90     | 32,01                 | 8,00 | \$4.400.959,19 |
| 1233   | 29-sep-16 | 01-oct-16 | 31-dic-16     | 21,99       | .....        | 90     | 32,985                | 8,25 | \$4.535.009,02 |
| 1612   | 26-dic-16 | 01-ene-17 | 30-mar-17     | 22,34       | .....        | 90     | 33,51                 | 8,38 | \$4.607.189,71 |
| 488    | 28-mar-17 | 01-abr-17 | 30-jun-17     | 22,33       | .....        | 90     | 33,495                | 8,37 | \$4.605.127,40 |
| 0907   | 30-jun-17 | 1-jul-17  | 30-sep-17     | 21,98       | .....        | 90     | 32,97                 | 8,24 | \$4.532.946,72 |
| 1298   | 29-sep-17 | 1-oct-17  | 31-oct-17     | 21,15       | .....        | 31     | 31,725                | 2,73 | \$1.502.389,30 |
| 1447   | 27-oct-17 | 1-nov-17  | 30-nov-17     | 20,96       | .....        | 30     | 31,44                 | 2,62 | \$1.440.863,86 |
| 1619   | 29-nov-17 | 1-dic-17  | 30-dic-17     | 20,77       | .....        | 30     | 31,155                | 2,60 | \$1.427.802,60 |
| 1890   | 28-dic-17 | 1-ene-18  | 30-ene-18     | 20,69       | .....        | 30     | 31,035                | 2,59 | \$1.422.303,12 |
| 0131   | 31-ene-18 | 1-feb-18  | 28-feb-18     | 21,01       | .....        | 28     | 31,515                | 2,45 | \$1.348.014,30 |
| 0259   | 28-feb-18 | 1-mar-18  | 30-mar-18     | 20,68       | .....        | 30     | 31,02                 | 2,59 | \$1.421.615,68 |
| 0398   | 28-mar-18 | 1-abr-18  | 30-abr-18     | 20,48       | .....        | 30     | 30,72                 | 2,56 | \$1.407.866,98 |
| 0527   | 27-abr-18 | 1-may-18  | 31-may-18     | 20,44       | .....        | 31     | 30,66                 | 2,64 | \$1.451.954,48 |
| 0687   | 27-abr-18 | 1-jun-18  | 30-jun-18     | 20,28       | .....        | 30     | 30,42                 | 2,54 | \$1.394.118,28 |
| 0820   | 28-jun-18 | 1-jul-18  | 31-jul-18     | 20,03       | .....        | 31     | 30,045                | 2,59 | \$1.422.830,15 |
| 0954   | 27-jul-18 | 1-ago-18  | 31-ago-18     | 19,94       | .....        | 31     | 29,91                 | 2,58 | \$1.416.437,01 |
| 1112   | 31-ago-18 | 1-sep-18  | 30-sep-18     | 19,81       | .....        | 30     | 29,715                | 2,48 | \$1.361.808,83 |
| 1294   | 28-sep-18 | 1-oct-18  | 31-oct-18     | 19,63       | .....        | 31     | 29,445                | 2,54 | \$1.394.416,17 |
| 1521   | 31-oct-18 | 1-nov-18  | 30-nov-18     | 19,49       | .....        | 30     | 29,235                | 2,44 | \$1.339.810,91 |
| 1708   | 29-nov-18 | 1-dic-18  | 31-dic-18     | 19,4        | .....        | 31     | 29,1                  | 2,51 | \$1.378.078,13 |
| 1872   | 27-dic-18 | 1-ene-19  | 31-ene-19     | 19,16       | .....        | 31     | 28,74                 | 2,47 | \$1.361.029,74 |
| 0111   | 31-ene-19 | 1-feb-19  | 28-feb-19     | 19,7        | .....        | 28     | 29,55                 | 2,30 | \$1.263.963,91 |
| 0263   | 28-feb-19 | 1-mar-19  | 31-mar-19     | 19,37       | .....        | 31     | 29,055                | 2,50 | \$1.375.947,08 |
| 0389   | 29-mar-19 | 1-abr-19  | 30-abr-19     | 19,32       | .....        | 30     | 28,98                 | 2,42 | \$1.328.124,52 |
| 0574   | 30-abr-19 | 1-may-19  | 31-may-19     | 19,34       | .....        | 31     | 29,01                 | 2,50 | \$1.373.816,03 |
| 0697   | 30-may-19 | 1-jun-19  | 30-jun-19     | 19,3        | .....        | 30     | 28,95                 | 2,41 | \$1.326.749,65 |
| 0829   | 28-jun-19 | 1-jul-19  | 31-jul-19     | 19,28       | .....        | 31     | 28,92                 | 2,49 | \$1.369.553,94 |
| 1018   | 31-jul-19 | 1-ago-19  | 30-ago-19     | 19,32       | .....        | 31     | 28,98                 | 2,50 | \$1.372.395,33 |
| 1145   | 30-ago-19 | 1-sep-19  | 30-sep-19     | 19,32       | .....        | 30     | 28,98                 | 2,42 | \$1.328.124,52 |
| 1293   | 30-sep-19 | 1-oct-19  | 31-oct-19     | 19,1        | .....        | 31     | 28,65                 | 2,47 | \$1.356.767,64 |
| 1293   | 30-sep-19 | 1-oct-19  | 30-sep-20     | 19,1        | .....        | 30     | 28,65                 | 2,39 | \$1.313.000,95 |
| 1474   | 30-oct-19 | 1-nov-19  | 30-nov-19     | 19,03       | .....        | 30     | 28,545                | 2,38 | \$1.308.188,90 |
| 1603   | 29-nov-19 | 1-dic-19  | 31-dic-19     | 18,91       | .....        | 31     | 28,365                | 2,44 | \$1.343.271,00 |
| 1768   | 27-dic-19 | 1-ene-20  | 31-ene-20     | 18,77       | .....        | 31     | 28,155                | 2,42 | \$1.333.326,11 |
| 0094   | 30-ene-20 | 1-feb-20  | 29-feb-20     | 19,06       | .....        | 29     | 28,59                 | 2,30 | \$1.266.576,17 |
| 0205   | 27-feb-20 | 1-mar-20  | 31-mar-20     | 18,95       | .....        | 31     | 28,425                | 2,45 | \$1.346.112,40 |
| 0351   | 27-mar-20 | 1-abr-20  | 30-abr-20     | 18,69       | .....        | 30     | 28,035                | 2,34 | \$1.284.816,11 |
| 0437   | 30-abr-20 | 1-may-20  | 31-may-20     | 18,19       | .....        | 31     | 27,285                | 2,35 | \$1.292.125,83 |
| 0505   | 29-may-20 | 1-jun-20  | 30-jun-20     | 18,12       | .....        | 30     | 27,18                 | 2,27 | \$1.245.632,31 |
| 0605   | 30-jun-20 | 1-jul-20  | 21-jul-20     | 18,12       | .....        | 31     | 27,18                 | 2,34 | \$1.287.153,39 |
| 0685   | 31-jul-20 | 1-ago-20  | 31-ago-20     | 18,29       | .....        | 31     | 27,435                | 2,36 | \$1.299.229,33 |
| 0769   | 28-ago-20 | 1-sep-20  | 30-sep-20     | 18,35       | .....        | 30     | 27,525                | 2,29 | \$1.261.443,32 |
| 0869   | 30-sep-20 | 1-oct-20  | 31-oct-20     | 18,09       | .....        | 30     | 27,135                | 2,26 | \$1.243.570,01 |
| 0947   | 29-oct-20 | 1-nov-20  | 30-nov-20     | 17,84       | .....        | 30     | 26,76                 | 2,23 | \$1.226.384,13 |
| 1034   | 26-nov-20 | 1-dic-20  | 31-dic-20     | 17,46       | .....        | 30     | 26,19                 | 2,18 | \$1.200.261,60 |
| 1215   | 30-dic-20 | 1-ene-21  | 31-ene-21     | 17,32       | .....        | 31     | 25,98                 | 2,24 | \$1.230.325,42 |
| 0064   | 29-ene-21 | 1-feb-21  | 28-feb-21     | 17,54       | .....        | 28     | 26,31                 | 2,05 | \$1.125.377,01 |
| 0161   | 26-feb-21 | 1-mar-21  | 31-mar-21     | 17,41       | .....        | 31     | 26,115                | 2,25 | \$1.236.718,57 |
| 0305   | 31-mar-21 | 1-abr-21  | 30-abr-21     | 17,31       | .....        | 30     | 25,965                | 2,16 | \$1.189.950,07 |
| 0407   | 30-abr-21 | 1-may-21  | 31-may-21     | 17,22       | .....        | 31     | 25,83                 | 2,22 | \$1.223.221,93 |
| 0509   | 28-may-21 | 1-jun-21  | 30-jun-21     | 17,21       | .....        | 30     | 25,815                | 2,15 | \$1.183.075,72 |
| 0622   | 30-jun-21 | 1-jul-21  | 31-jul-21     | 17,18       | .....        | 31     | 25,77                 | 2,22 | \$1.220.380,53 |
| 0804   | 30-jul-21 | 1-ago-21  | 31-ago-21     | 17,24       | .....        | 31     | 25,86                 | 2,23 | \$1.224.642,63 |

