



*Humberto Pacheco Alvarez*  
*Magister Derecho Contencioso Administrativo*

Señor

**JUEZ PROMISCO MUNICIPAL SOLANO – CAQUETA**

E. S. D.

REF: PROCESO EJECUTIVO HIPOTECARIO  
DEMANDANTE: BANCO AGRARIO DE COLOMBIA S.A.  
DEMANDADO: **ALVARO RINCON SANCHEZ**  
RADICADO: 2019-00024-00

**HUMBERTO PACHECO ALVAREZ**, mayor de edad, vecino y residente en la ciudad de Florencia Caquetá, identificado con la cédula de ciudadanía No 17'632.403 expedida en Florencia, abogado con Tarjeta Profesional No 167.635 del C.S. de la J., obrando como apoderado judicial del demandante en el proceso de la referencia, por medio del presente escrito me permito presentar actualización de la liquidación del crédito así:

Pagaré No 075676100000922. Liquidación intereses moratorios sobre el capital desde el 14 de noviembre de 2019 al 24 de noviembre de 2021.

| <b>CAPITAL 12.600.000,00</b>     |              |                  |             |                       |                          |                           |
|----------------------------------|--------------|------------------|-------------|-----------------------|--------------------------|---------------------------|
| <b>VIGENCIA</b>                  |              | <b>INT. CTE.</b> | <b>DIAS</b> | <b>TASA INT. MORA</b> | <b>INTERES MORATORIO</b> | <b>CAP. MAS INT. MORA</b> |
| <b>DESDE</b>                     | <b>HASTA</b> |                  |             |                       |                          |                           |
| VIENE DE LA LIQUIDACION ANTERIOR |              |                  |             |                       |                          | 37.514.440,00             |
| 1-nov-19                         | 30-nov-19    | 19,03            | 17          | 28,55                 | 169.873                  | 37.684.312,50             |
| 1-dic-19                         | 31-dic-19    | 18,91            | 30          | 28,37                 | 297.885                  | 37.982.197,50             |
| 1-ene-20                         | 31-ene-20    | 18,77            | 30          | 28,16                 | 295.680                  | 38.277.877,50             |
| 1-feb-20                         | 29-feb-20    | 19,06            | 30          | 28,59                 | 300.195                  | 38.578.072,50             |
| 1-mar-20                         | 31-mar-20    | 18,95            | 30          | 28,43                 | 298.515                  | 38.876.587,50             |
| 1-abr-20                         | 30-abr-20    | 18,69            | 30          | 28,04                 | 294.420                  | 39.171.007,50             |
| 1-may-20                         | 31-may-20    | 18,19            | 30          | 27,29                 | 286.545                  | 39.457.552,50             |
| 1-jun-20                         | 30-jun-20    | 18,12            | 30          | 27,18                 | 285.390                  | 39.742.942,50             |
| 1-jul-20                         | 31-jul-20    | 18,12            | 30          | 27,18                 | 285.390                  | 40.028.332,50             |
| 1-ago-20                         | 30-ago-20    | 18,29            | 30          | 27,44                 | 288.120                  | 40.316.452,50             |
| 1-sep-20                         | 30-sep-20    | 18,35            | 30          | 27,53                 | 289.065                  | 40.605.517,50             |
| 1-oct-20                         | 31-oct-20    | 18,09            | 30          | 27,14                 | 284.970                  | 40.890.487,50             |
| 1-nov-20                         | 30-nov-20    | 17,84            | 30          | 26,76                 | 280.980                  | 41.171.467,50             |
| 1-dic-20                         | 31-dic-20    | 17,46            | 30          | 26,19                 | 274.995                  | 41.446.462,50             |
| 1-ene-21                         | 31-ene-21    | 17,32            | 30          | 25,98                 | 272.790                  | 41.719.252,50             |
| 1-feb-21                         | 28-feb-21    | 17,52            | 30          | 26,28                 | 275.940                  | 41.995.192,50             |
| 1-mar-21                         | 31-mar-21    | 17,41            | 30          | 26,12                 | 274.260                  | 42.269.452,50             |
| 1-abr-21                         | 30-abr-21    | 17,31            | 30          | 25,97                 | 272.685                  | 42.542.137,50             |
| 1-may-21                         | 31-may-21    | 17,22            | 30          | 25,83                 | 271.215                  | 42.813.352,50             |
| 1-jun-21                         | 30-jun-21    | 17,21            | 30          | 25,82                 | 271.110                  | 43.084.462,50             |
| 1-jul-21                         | 31-jul-21    | 17,18            | 30          | 25,77                 | 270.585                  | 43.355.047,50             |
| 1-ago-21                         | 31-ago-21    | 17,24            | 30          | 25,86                 | 271.530                  | 43.626.577,50             |
| 1-sep-21                         | 30-sep-21    | 17,19            | 30          | 25,79                 | 270.795                  | 43.897.372,50             |
| 1-oct-21                         | 31-oct-21    | 17,08            | 30          | 25,62                 | 269.010                  | 44.166.382,50             |
| 1-nov-21                         | 30-nov-21    | 17,27            | 24          | 25,91                 | 217.644                  | 44.384.026,50             |



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|   |                      |
|---|----------------------|
| Intereses moratorios desde el 14 de noviembre de 2019 al 24 de noviembre del 2021 | -6.869.586,50        |
| <b>TOTAL LIQUIDACION</b>  | <b>44.384.026,50</b> |

Pagaré No 075676100001113. Liquidación intereses moratorios sobre el capital desde el 14 de noviembre de 2019 al 24 de noviembre de 2021.

| VIGENCIA  |           | INT. CTE. | DIAS | TASA INT. MORA | INTERES MORATORIO | CAP. MAS INT. MORA   |
|---|-----------|-----------|------|----------------|-------------------|----------------------|
| DESDE   | HASTA     |           |      |                |                   |                      |
| <b>CAPITAL 13.750.000,00</b>  |           |           |      |                |                   |                      |
| VIENE DE LA LIQUIDACION ANTERIOR  |           |           |      |                |                   | 41.741.736,29        |
| 1-nov-19  | 30-nov-19 | 19,03     | 17   | 28,55          | 185.377           | 41.927.113,03        |
| 1-dic-19  | 31-dic-19 | 18,91     | 30   | 28,37          | 325.073           | 42.252.185,94        |
| 1-ene-20  | 31-ene-20 | 18,77     | 30   | 28,16          | 322.667           | 42.574.852,61        |
| 1-feb-20  | 29-feb-20 | 19,06     | 30   | 28,59          | 327.594           | 42.902.446,36        |
| 1-mar-20  | 31-mar-20 | 18,95     | 30   | 28,43          | 325.760           | 43.228.206,78        |
| 1-abr-20  | 30-abr-20 | 18,69     | 30   | 28,04          | 321.292           | 43.549.498,44        |
| 1-may-20  | 31-may-20 | 18,19     | 30   | 27,29          | 312.698           | 43.862.196,36        |
| 1-jun-20  | 30-jun-20 | 18,12     | 30   | 27,18          | 311.438           | 44.173.633,86        |
| 1-jul-20  | 31-jul-20 | 18,12     | 30   | 27,18          | 311.438           | 44.485.071,36        |
| 1-ago-20  | 30-ago-20 | 18,29     | 30   | 27,44          | 314.417           | 44.799.488,03        |
| 1-sep-20  | 30-sep-20 | 18,35     | 30   | 27,53          | 315.448           | 45.114.935,94        |
| 1-oct-20  | 31-oct-20 | 18,09     | 30   | 27,14          | 310.979           | 45.425.915,11        |
| 1-nov-20  | 30-nov-20 | 17,84     | 30   | 26,76          | 306.625           | 45.732.540,11        |
| 1-dic-20  | 31-dic-20 | 17,46     | 30   | 26,19          | 300.094           | 46.032.633,86        |
| 1-ene-21  | 31-ene-21 | 17,32     | 30   | 25,98          | 297.688           | 46.330.321,36        |
| 1-feb-21  | 28-feb-21 | 17,52     | 30   | 26,28          | 301.125           | 46.631.446,36        |
| 1-mar-21  | 31-mar-21 | 17,41     | 30   | 26,12          | 299.292           | 46.930.738,03        |
| 1-abr-21  | 30-abr-21 | 17,31     | 30   | 25,97          | 297.573           | 47.228.310,94        |
| 1-may-21  | 31-may-21 | 17,22     | 30   | 25,83          | 295.969           | 47.524.279,69        |
| 1-jun-21  | 30-jun-21 | 17,21     | 30   | 25,82          | 295.854           | 47.820.133,86        |
| 1-jul-21  | 31-jul-21 | 17,18     | 30   | 25,77          | 295.281           | 48.115.415,11        |
| 1-ago-21  | 31-ago-21 | 17,24     | 30   | 25,86          | 296.313           | 48.411.727,61        |
| 1-sep-21  | 30-sep-21 | 17,19     | 30   | 25,79          | 295.510           | 48.707.238,03        |
| 1-oct-21  | 31-oct-21 | 17,08     | 30   | 25,62          | 293.563           | 49.000.800,53        |
| 1-nov-21  | 30-nov-21 | 17,27     | 24   | 25,91          | 237.508           | 49.238.308,86        |
| Intereses moratorios desde el 14 de noviembre de 2019 al 24 de noviembre del 2021 |           |           |      |                |                   | -7.496.572,57        |
| <b>TOTAL LIQUIDACION</b>  |           |           |      |                |                   | <b>49.238.308,86</b> |

Pagaré No 4481850002458931. Liquidación intereses moratorios sobre el capital desde el 14 de noviembre de 2019 al 24 de noviembre de 2021.

| VIGENCIA                         |           | INT. CTE. | DIAS | TASA INT. MORA | INTERES MORATORIO | CAP. MAS INT. MORA |
|----------------------------------|-----------|-----------|------|----------------|-------------------|--------------------|
| DESDE                            | HASTA     |           |      |                |                   |                    |
| <b>CAPITAL 1.457.838,00</b>      |           |           |      |                |                   |                    |
| VIENE DE LA LIQUIDACION ANTERIOR |           |           |      |                |                   | 4.583.050,29       |
| 1-nov-19                         | 30-nov-19 | 19,03     | 17   | 28,55          | 19.654            | 4.602.704,78       |
| 1-dic-19                         | 31-dic-19 | 18,91     | 30   | 28,37          | 34.466            | 4.637.170,50       |
| 1-ene-20                         | 31-ene-20 | 18,77     | 30   | 28,16          | 34.211            | 4.671.381,10       |
| 1-feb-20                         | 29-feb-20 | 19,06     | 30   | 28,59          | 34.733            | 4.706.114,09       |



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|   |           |       |    |       |        |                     |
|---|-----------|-------|----|-------|--------|---------------------|
| 1-mar-20  | 31-mar-20 | 18,95 | 30 | 28,43 | 34.539 | 4.740.652,70        |
| 1-abr-20  | 30-abr-20 | 18,69 | 30 | 28,04 | 34.065 | 4.774.717,52        |
| 1-may-20  | 31-may-20 | 18,19 | 30 | 27,29 | 33.154 | 4.807.871,18        |
| 1-jun-20  | 30-jun-20 | 18,12 | 30 | 27,18 | 33.020 | 4.840.891,21        |
| 1-jul-20  | 31-jul-20 | 18,12 | 30 | 27,18 | 33.020 | 4.873.911,24        |
| 1-ago-20  | 30-ago-20 | 18,29 | 30 | 27,44 | 33.336 | 4.907.247,14        |
| 1-sep-20  | 30-sep-20 | 18,35 | 30 | 27,53 | 33.445 | 4.940.692,37        |
| 1-oct-20  | 31-oct-20 | 18,09 | 30 | 27,14 | 32.971 | 4.973.663,81        |
| 1-nov-20  | 30-nov-20 | 17,84 | 30 | 26,76 | 32.510 | 5.006.173,60        |
| 1-dic-20  | 31-dic-20 | 17,46 | 30 | 26,19 | 31.817 | 5.037.990,91        |
| 1-ene-21  | 31-ene-21 | 17,32 | 30 | 25,98 | 31.562 | 5.069.553,10        |
| 1-feb-21  | 28-feb-21 | 17,52 | 30 | 26,28 | 31.927 | 5.101.479,76        |
| 1-mar-21  | 31-mar-21 | 17,41 | 30 | 26,12 | 31.732 | 5.133.212,03        |
| 1-abr-21  | 30-abr-21 | 17,31 | 30 | 25,97 | 31.550 | 5.164.762,07        |
| 1-may-21  | 31-may-21 | 17,22 | 30 | 25,83 | 31.380 | 5.196.142,04        |
| 1-jun-21  | 30-jun-21 | 17,21 | 30 | 25,82 | 31.368 | 5.227.509,85        |
| 1-jul-21  | 31-jul-21 | 17,18 | 30 | 25,77 | 31.307 | 5.258.816,92        |
| 1-ago-21  | 31-ago-21 | 17,24 | 30 | 25,86 | 31.416 | 5.290.233,33        |
| 1-sep-21  | 30-sep-21 | 17,19 | 30 | 25,79 | 31.331 | 5.321.564,70        |
| 1-oct-21  | 31-oct-21 | 17,08 | 30 | 25,62 | 31.125 | 5.352.689,54        |
| 1-nov-21  | 30-nov-21 | 17,27 | 24 | 25,91 | 25.182 | 5.377.871,26        |
| Intereses moratorios desde el 14 de noviembre de 2019 al 24 de noviembre del 2021 |           |       |    |       |        | -794.820,97         |
| <b>TOTAL LIQUIDACION</b>  |           |       |    |       |        | <b>5.377.871,26</b> |

RESUMEN,

|                           |                        |
|---------------------------|------------------------|
| Pagare N°075676100000922  | \$44.384.026,50        |
| Pagare N°075676100001113  | \$49.238.308,86        |
| Pagare N°4481850002458931 | \$5.377.871,26         |
| <b>TOTAL LIQUIDACION</b>  | <b>\$99.000.206,62</b> |

Ruego al señor juez, impartir su aprobación.

Atentamente,

**HUMBERTO PACHECO ALVAREZ**  
C. C. N° 17.632.403 de Florencia  
T. P. 167.635 del C. S. de la J.