

Señor

REF: PROCESO EJECUTIVO DE BANCO AGRARIO DE COLOMBIA S.A.
CONTRA: ADIER JESUS AVENDANO ORJUELA
RAD: 471894089001-20150083700

IVONNE LINERO DE LA CRUZ, mayor de edad y de esta vecindad, actuando en mi calidad de apoderado judicial de la parte demandante, por medio del presente escrito y con mi acostumbrado respeto, dentro de la oportunidad procesal para ello, vengo ante usted, a presentar la liquidación del crédito a fecha a treinta y uno (31) de enero del dos mil veintiuno (2.021), dentro del proceso de la referencia, de conformidad a lo establecido en el artículo 521 del C.P.C., de la siguiente manera:

PRIMERO: PAGARE No. 042096100005333

LIQUIDACION DEL CREDITO	
A. CAPITAL	\$ 5.719.480,00
B. INTERESES DE MORA	\$ 5.251.013,44

\$5.719.480,00	21,48%	32,22%	0,0773%	01/07/2017	31/07/2017	31	\$136.995,9476
\$5.719.480,00	21,48%	32,22%	0,0773%	01/08/2017	31/08/2017	31	\$136.995,9476
\$5.719.480,00	21,15%	31,73%	0,0761%	01/09/2017	30/09/2017	30	\$130.539,9302
\$5.719.480,00	21,15%	31,73%	0,0761%	01/10/2017	31/10/2017	31	\$134.891,2612
\$5.719.480,00	20,96%	31,44%	0,0754%	01/11/2017	30/11/2017	30	\$129.367,2311
\$5.719.480,00	20,77%	31,16%	0,0747%	01/12/2017	31/12/2017	31	\$132.467,6830
\$5.719.480,00	20,69%	31,04%	0,0744%	01/01/2018	31/01/2018	31	\$131.957,4560
\$5.719.480,00	21,01%	31,52%	0,0756%	01/02/2018	28/02/2018	28	\$121.030,7804
\$5.719.480,00	20,68%	31,02%	0,0744%	01/03/2018	31/03/2018	31	\$131.893,6776
\$5.719.480,00	20,48%	30,72%	0,0737%	01/04/2018	30/04/2018	30	\$126.404,6227
\$5.719.480,00	20,44%	30,66%	0,0735%	01/05/2018	31/05/2018	31	\$130.362,9967
\$5.719.480,00	20,28%	30,42%	0,0729%	01/06/2018	30/06/2018	30	\$125.170,2026
\$5.719.480,00	20,03%	30,05%	0,0721%	01/07/2018	31/07/2018	31	\$127.748,0833
\$5.719.480,00	19,94%	29,91%	0,0717%	01/08/2018	31/08/2018	31	\$127.174,0780
\$5.719.480,00	19,81%	29,72%	0,0713%	01/09/2018	30/09/2018	30	\$122.269,3153
\$5.719.480,00	19,63%	29,45%	0,0706%	01/10/2018	31/10/2018	31	\$125.196,9484
\$5.719.480,00	19,49%	29,24%	0,0701%	01/11/2018	30/11/2018	30	\$120.294,2430
\$5.719.480,00	19,40%	29,10%	0,0698%	01/12/2018	31/12/2018	31	\$123.730,0458
\$5.719.480,00	19,16%	28,74%	0,0689%	01/01/2019	31/01/2019	31	\$122.199,3648
\$5.719.480,00	19,70%	29,55%	0,0709%	01/02/2019	28/02/2019	28	\$113.484,3586
\$5.719.480,00	19,37%	29,06%	0,0697%	01/03/2019	31/03/2019	31	\$123.538,7106
\$5.719.480,00	19,32%	28,98%	0,0695%	01/04/2019	30/04/2019	30	\$119.244,9859
\$5.719.480,00	19,34%	29,01%	0,0696%	01/05/2019	31/05/2019	31	\$123.347,3755
\$5.719.480,00	19,30%	28,95%	0,0694%	01/06/2019	30/06/2019	30	\$119.121,5439

\$5.719.480,00	19,28%	28,92%	0,0694%	01/07/2019	31/07/2019	31	\$122.964,7053
\$5.719.480,00	19,32%	28,98%	0,0695%	01/08/2019	31/08/2019	31	\$123.219,8188
\$5.719.480,00	19,32%	28,98%	0,0695%	01/09/2019	30/09/2019	30	\$119.244,9859
\$5.719.480,00	19,10%	28,65%	0,0687%	01/10/2019	31/10/2019	31	\$121.816,6945
\$5.719.480,00	19,03%	28,55%	0,0685%	01/11/2019	30/11/2019	30	\$117.455,0767
\$5.719.480,00	18,91%	28,37%	0,0680%	01/12/2019	31/12/2019	31	\$120.604,9054
\$5.719.480,00	18,77%	28,16%	0,0675%	01/01/2020	31/01/2020	31	\$119.712,0082
\$5.719.480,00	19,06%	28,59%	0,0686%	01/02/2020	29/02/2020	29	\$113.718,8984
\$5.719.480,00	18,95%	28,43%	0,0682%	01/03/2020	31/03/2020	31	\$120.860,0189
\$5.719.480,00	18,69%	28,04%	0,0672%	01/04/2020	30/04/2020	30	\$115.356,5624
\$5.719.480,00	18,19%	27,29%	0,0654%	01/05/2020	31/05/2020	31	\$116.012,8625
\$5.719.480,00	18,12%	27,18%	0,0652%	01/06/2020	30/06/2020	30	\$111.838,4650
\$5.719.480,00	18,12%	27,18%	0,0652%	01/07/2020	31/07/2020	31	\$115.566,4139
\$5.719.480,00	18,29%	27,44%	0,0658%	01/08/2020	31/08/2020	31	\$116.650,6462
\$5.719.480,00	18,35%	27,53%	0,0660%	01/09/2020	30/09/2020	30	\$113.258,0482
\$5.719.480,00	18,09%	27,14%	0,0651%	01/10/2020	31/10/2020	31	\$115.375,0787
\$5.719.480,00	17,84%	26,76%	0,0642%	01/11/2020	30/11/2020	30	\$110.110,2768
\$5.719.480,00	17,46%	26,19%	0,0628%	01/12/2020	31/12/2020	31	\$111.357,0412
\$5.719.480,00	17,32%	25,98%	0,0623%	01/01/2021	31/01/2021	31	\$110.464,1439
TOTAL INTERESES A 31 DE ENERO DEL 2021							\$5.251.013,44

SEGUNDO: PAGARE No. 042096100007541

LIQUIDACION DEL CREDITO	
A. CAPITAL	\$ 4.800.000,00
B. INTERESES DE MORA	\$ 4.406.845,47

\$4.800.000,00	21,48%	32,22%	0,0773%	01/07/2017	31/07/2017	31	\$114.972,0863
\$4.800.000,00	21,48%	32,22%	0,0773%	01/08/2017	31/08/2017	31	\$114.972,0863
\$4.800.000,00	21,15%	31,73%	0,0761%	01/09/2017	30/09/2017	30	\$109.553,9568
\$4.800.000,00	21,15%	31,73%	0,0761%	01/10/2017	31/10/2017	31	\$113.205,7554
\$4.800.000,00	20,96%	31,44%	0,0754%	01/11/2017	30/11/2017	30	\$108.569,7842
\$4.800.000,00	20,77%	31,16%	0,0747%	01/12/2017	31/12/2017	31	\$111.171,7986
\$4.800.000,00	20,69%	31,04%	0,0744%	01/01/2018	31/01/2018	31	\$110.743,5971
\$4.800.000,00	21,01%	31,52%	0,0756%	01/02/2018	28/02/2018	28	\$101.573,5252
\$4.800.000,00	20,68%	31,02%	0,0744%	01/03/2018	31/03/2018	31	\$110.690,0719
\$4.800.000,00	20,48%	30,72%	0,0737%	01/04/2018	30/04/2018	30	\$106.083,4532
\$4.800.000,00	20,44%	30,66%	0,0735%	01/05/2018	31/05/2018	31	\$109.405,4676
\$4.800.000,00	20,28%	30,42%	0,0729%	01/06/2018	30/06/2018	30	\$105.047,4820
\$4.800.000,00	20,03%	30,05%	0,0721%	01/07/2018	31/07/2018	31	\$107.210,9353
\$4.800.000,00	19,94%	29,91%	0,0717%	01/08/2018	31/08/2018	31	\$106.729,2086
\$4.800.000,00	19,81%	29,72%	0,0713%	01/09/2018	30/09/2018	30	\$102.612,9496
\$4.800.000,00	19,63%	29,45%	0,0706%	01/10/2018	31/10/2018	31	\$105.069,9281
\$4.800.000,00	19,49%	29,24%	0,0701%	01/11/2018	30/11/2018	30	\$100.955,3957
\$4.800.000,00	19,40%	29,10%	0,0698%	01/12/2018	31/12/2018	31	\$103.838,8489
\$4.800.000,00	19,16%	28,74%	0,0689%	01/01/2019	31/01/2019	31	\$102.554,2446
\$4.800.000,00	19,70%	29,55%	0,0709%	01/02/2019	28/02/2019	28	\$95.240,2878

\$4.800.000,00	19,37%	29,06%	0,0697%	01/03/2019	31/03/2019	31	\$103.678,2734
\$4.800.000,00	19,32%	28,98%	0,0695%	01/04/2019	30/04/2019	30	\$100.074,8201
\$4.800.000,00	19,34%	29,01%	0,0696%	01/05/2019	31/05/2019	31	\$103.517,6978
\$4.800.000,00	19,30%	28,95%	0,0694%	01/06/2019	30/06/2019	30	\$99.971,2230
\$4.800.000,00	19,28%	28,92%	0,0694%	01/07/2019	31/07/2019	31	\$103.196,5468
\$4.800.000,00	19,32%	28,98%	0,0695%	01/08/2019	31/08/2019	31	\$103.410,6475
\$4.800.000,00	19,32%	28,98%	0,0695%	01/09/2019	30/09/2019	30	\$100.074,8201
\$4.800.000,00	19,10%	28,65%	0,0687%	01/10/2019	31/10/2019	31	\$102.233,0935
\$4.800.000,00	19,03%	28,55%	0,0685%	01/11/2019	30/11/2019	30	\$98.572,6619
\$4.800.000,00	18,91%	28,37%	0,0680%	01/12/2019	31/12/2019	31	\$101.216,1151
\$4.800.000,00	18,77%	28,16%	0,0675%	01/01/2020	31/01/2020	31	\$100.466,7626
\$4.800.000,00	19,06%	28,59%	0,0686%	01/02/2020	29/02/2020	29	\$95.437,1223
\$4.800.000,00	18,95%	28,43%	0,0682%	01/03/2020	31/03/2020	31	\$101.430,2158
\$4.800.000,00	18,69%	28,04%	0,0672%	01/04/2020	30/04/2020	30	\$96.811,5108
\$4.800.000,00	18,19%	27,29%	0,0654%	01/05/2020	31/05/2020	31	\$97.362,3022
\$4.800.000,00	18,12%	27,18%	0,0652%	01/06/2020	30/06/2020	30	\$93.858,9928
\$4.800.000,00	18,12%	27,18%	0,0652%	01/07/2020	31/07/2020	31	\$96.987,6259
\$4.800.000,00	18,29%	27,44%	0,0658%	01/08/2020	31/08/2020	31	\$97.897,5540
\$4.800.000,00	18,35%	27,53%	0,0660%	01/09/2020	30/09/2020	30	\$95.050,3597
\$4.800.000,00	18,09%	27,14%	0,0651%	01/10/2020	31/10/2020	31	\$96.827,0504
\$4.800.000,00	17,84%	26,76%	0,0642%	01/11/2020	30/11/2020	30	\$92.408,6331
\$4.800.000,00	17,46%	26,19%	0,0628%	01/12/2020	31/12/2020	31	\$93.454,9640
\$4.800.000,00	17,32%	25,98%	0,0623%	01/01/2021	31/01/2021	31	\$92.705,6115
TOTAL INTERESES DE MORA A 31 DE ENERO DEL 2021							\$4.406.845,47

TERCER: PAGARE No. 042096100008870

LIQUIDACION DEL CREDITO	
A. CAPITAL	\$ 2.115.000,00
B. INTERESES DE MORA	\$ 1.941.766,28

\$2.115.000,00	21,48%	32,22%	0,0773%	01/07/2017	31/07/2017	31	\$50.659,5755
\$2.115.000,00	21,48%	32,22%	0,0773%	01/08/2017	31/08/2017	31	\$50.659,5755
\$2.115.000,00	21,15%	31,73%	0,0761%	01/09/2017	30/09/2017	30	\$48.272,2122
\$2.115.000,00	21,15%	31,73%	0,0761%	01/10/2017	31/10/2017	31	\$49.881,2860
\$2.115.000,00	20,96%	31,44%	0,0754%	01/11/2017	30/11/2017	30	\$47.838,5612
\$2.115.000,00	20,77%	31,16%	0,0747%	01/12/2017	31/12/2017	31	\$48.985,0737
\$2.115.000,00	20,69%	31,04%	0,0744%	01/01/2018	31/01/2018	31	\$48.796,3975
\$2.115.000,00	21,01%	31,52%	0,0756%	01/02/2018	28/02/2018	28	\$44.755,8345
\$2.115.000,00	20,68%	31,02%	0,0744%	01/03/2018	31/03/2018	31	\$48.772,8129
\$2.115.000,00	20,48%	30,72%	0,0737%	01/04/2018	30/04/2018	30	\$46.743,0216
\$2.115.000,00	20,44%	30,66%	0,0735%	01/05/2018	31/05/2018	31	\$48.206,7842
\$2.115.000,00	20,28%	30,42%	0,0729%	01/06/2018	30/06/2018	30	\$46.286,5468
\$2.115.000,00	20,03%	30,05%	0,0721%	01/07/2018	31/07/2018	31	\$47.239,8183
\$2.115.000,00	19,94%	29,91%	0,0717%	01/08/2018	31/08/2018	31	\$47.027,5576
\$2.115.000,00	19,81%	29,72%	0,0713%	01/09/2018	30/09/2018	30	\$45.213,8309

\$2.115.000,00	19,63%	29,45%	0,0706%	01/10/2018	31/10/2018	31	\$46.296,4371
\$2.115.000,00	19,49%	29,24%	0,0701%	01/11/2018	30/11/2018	30	\$44.483,4712
\$2.115.000,00	19,40%	29,10%	0,0698%	01/12/2018	31/12/2018	31	\$45.753,9928
\$2.115.000,00	19,16%	28,74%	0,0689%	01/01/2019	31/01/2019	31	\$45.187,9640
\$2.115.000,00	19,70%	29,55%	0,0709%	01/02/2019	28/02/2019	28	\$41.965,2518
\$2.115.000,00	19,37%	29,06%	0,0697%	01/03/2019	31/03/2019	31	\$45.683,2392
\$2.115.000,00	19,32%	28,98%	0,0695%	01/04/2019	30/04/2019	30	\$44.095,4676
\$2.115.000,00	19,34%	29,01%	0,0696%	01/05/2019	31/05/2019	31	\$45.612,4856
\$2.115.000,00	19,30%	28,95%	0,0694%	01/06/2019	30/06/2019	30	\$44.049,8201
\$2.115.000,00	19,28%	28,92%	0,0694%	01/07/2019	31/07/2019	31	\$45.470,9784
\$2.115.000,00	19,32%	28,98%	0,0695%	01/08/2019	31/08/2019	31	\$45.565,3165
\$2.115.000,00	19,32%	28,98%	0,0695%	01/09/2019	30/09/2019	30	\$44.095,4676
\$2.115.000,00	19,10%	28,65%	0,0687%	01/10/2019	31/10/2019	31	\$45.046,4568
\$2.115.000,00	19,03%	28,55%	0,0685%	01/11/2019	30/11/2019	30	\$43.433,5791
\$2.115.000,00	18,91%	28,37%	0,0680%	01/12/2019	31/12/2019	31	\$44.598,3507
\$2.115.000,00	18,77%	28,16%	0,0675%	01/01/2020	31/01/2020	31	\$44.268,1673
\$2.115.000,00	19,06%	28,59%	0,0686%	01/02/2020	29/02/2020	29	\$42.051,9820
\$2.115.000,00	18,95%	28,43%	0,0682%	01/03/2020	31/03/2020	31	\$44.692,6888
\$2.115.000,00	18,69%	28,04%	0,0672%	01/04/2020	30/04/2020	30	\$42.657,5719
\$2.115.000,00	18,19%	27,29%	0,0654%	01/05/2020	31/05/2020	31	\$42.900,2644
\$2.115.000,00	18,12%	27,18%	0,0652%	01/06/2020	30/06/2020	30	\$41.356,6187
\$2.115.000,00	18,12%	27,18%	0,0652%	01/07/2020	31/07/2020	31	\$42.735,1727
\$2.115.000,00	18,29%	27,44%	0,0658%	01/08/2020	31/08/2020	31	\$43.136,1097
\$2.115.000,00	18,09%	27,14%	0,0651%	01/10/2020	31/10/2020	31	\$42.664,4191
\$2.115.000,00	17,84%	26,76%	0,0642%	01/11/2020	30/11/2020	30	\$40.717,5540
\$2.115.000,00	17,46%	26,19%	0,0628%	01/12/2020	31/12/2020	31	\$41.178,5935
\$2.115.000,00	17,32%	25,98%	0,0623%	01/01/2021	31/01/2021	31	\$40.848,4101
TOTAL INTERESES DE MORA A 31 DE ENERO DEL 2021							\$1.941.766,28

TOTAL, LIQUIDACION DEL CREDITO

A. INTERESES DE MORA	\$	11.599.625,19
B. INTERESES DE MORA DESDE 15/09/2015-26/03/2015 Y 14/08/2015 HASTA 30/06/2017	\$	19.780.570.40
C. TOTAL, LIQUIDACION CREDITO A 31 DE ENERO DEL 2.021	\$	31.380.195,59

SON: TREINTA Y UN MILLONES TRESCIENTOS OCHENTA MIL CIENTO NOVENTA Y CINCO PESOS CON 59/CTVS. MCTE.

Barranquilla, 16 de febrero del 2.021

Del señor juez, cordialmente;


IVONNE LINERO DE LA CRUZ
T. P. 22.417 del C. S. J.
C. C. No. 22.421.755 de Biquilla

Ivonne Linero De La Cruz

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Abogada