



**JUAN JOSE NIEVES ZARATE**  
**ABOGADO TITULADO Y EN EJERCICIO**



Asuntos: Administrativos, Civiles, Conciliaciones, Familia, Sucesiones y Tutelas.  
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Señor (a)  
JUEZ PRIMERO PROMISCOU MUNICIPAL  
Ciénaga - Magdalena  
E.S.D.

REFERENCIA: PROCESO: EJECUTIVO

DEMANDANTE: BANCO AGRARIO DE COLOMBIA S.A.  
DEMANDADO: DALBER DE JESUS MONTOYA RIVERA  
ASUNTO: LIQUIDACION DEL CREDITO  
RADICADO: 2020-00337

JUAN JOSE NIEVES ZARATE, mayor de edad, abogado en ejercicio, identificado como aparece al pie de mi correspondiente firma, vecino del municipio de Fonseca-La Guajira, actuando en mi condición de apoderado judicial de la entidad denominada BANCO AGRARIO DE COLOMBIA S.A. dentro del proceso de la referencia, con el respeto acostumbrado presento ante su despacho la correspondiente liquidación del crédito dentro de la oportunidad legal a saber, con la finalidad de que sea aprobada por su despacho:

La siguiente petición versa sobre los siguientes presupuestos:

1) \* Capital contenido dentro del pagare No. 042096100012689 \$ 8.000.000 M/cte.

\*Intereses corrientes desde el 10 de diciembre del 2018 hasta el 10 de diciembre del 2019 a la tasa efectiva anual 11.64 % = \$ 1.652.841 M/cte.

\*Intereses moratorios desde el vencimiento el día 11 de diciembre del 2019 hasta la fecha de liquidación del crédito el día 16 de junio del 2021 \$ 3.324.773 M/cte.

Otros conceptos \$ 0

**Para un total de la obligación de \$ 12.997.614**

**PRUEBAS Y ANEXOS**

Solicito se tengan como pruebas documentales, la tabla Excel donde consta la liquidación del crédito presentada en su despacho.

Atentamente,

JUAN JOSE NIEVES ZARATE  
C. C. No. 84.086.893 de Riohacha La Guajira  
T. P. No. 157.274. C. S. J.

| LIQUIDADOR DE CREDITO |            |        |          |         |       |     |       |         |            | Total Intereses | Total Capital + Intereses |
|-----------------------|------------|--------|----------|---------|-------|-----|-------|---------|------------|-----------------|---------------------------|
| AÑO                   | MESES      | ERES   | ANLIERES | MENSORA | MAXIR | NUM | DIAS  | LIQUIDA | LIQUIDA    | \$ 3,324,773    | 11324773.33               |
| 2014                  | Enero      | 19.65% | 1.64%    | 2.46%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Febrero    | 19.65% | 1.64%    | 2.46%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Marzo      | 19.65% | 1.64%    | 2.46%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Abril      | 19.63% | 1.64%    | 2.45%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Mayo       | 19.63% | 1.64%    | 2.45%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Junio      | 19.63% | 1.64%    | 2.45%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Julio      | 19.33% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Agosto     | 19.33% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Septiembre | 19.33% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Octubre    | 18.17% | 1.60%    | 2.40%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Noviembre  | 19.17% | 1.60%    | 2.40%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2014                  | Diciembre  | 19.17% | 1.60%    | 2.40%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Enero      | 19.21% | 1.60%    | 2.40%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Febrero    | 19.21% | 1.60%    | 2.40%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Marzo      | 18.21% | 1.60%    | 2.40%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Abril      | 19.37% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Mayo       | 19.37% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Junio      | 19.37% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Julio      | 19.26% | 1.61%    | 2.41%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Agosto     | 19.26% | 1.61%    | 2.41%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Septiembre | 19.33% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Octubre    | 19.33% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Noviembre  | 19.33% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2015                  | Diciembre  | 19.33% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Enero      | 19.68% | 1.64%    | 2.46%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Febrero    | 19.68% | 1.64%    | 2.46%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Marzo      | 19.68% | 1.64%    | 2.46%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Abril      | 20.54% | 1.71%    | 2.57%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Mayo       | 20.54% | 1.71%    | 2.57%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Junio      | 20.54% | 1.71%    | 2.57%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Julio      | 21.34% | 1.78%    | 2.67%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Agosto     | 21.34% | 1.78%    | 2.67%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Septiembre | 21.34% | 1.78%    | 2.67%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Octubre    | 21.98% | 1.83%    | 2.75%   | 0     | 0   | 2.75% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Noviembre  | 21.98% | 1.83%    | 2.75%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2016                  | Diciembre  | 21.98% | 1.83%    | 2.75%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Enero      | 22.34% | 1.86%    | 2.78%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Febrero    | 22.34% | 1.86%    | 2.78%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Marzo      | 22.34% | 1.86%    | 2.78%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Abril      | 22.33% | 1.86%    | 2.78%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Mayo       | 22.33% | 1.86%    | 2.78%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Junio      | 22.33% | 1.86%    | 2.78%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Julio      | 21.98% | 1.83%    | 2.75%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Agosto     | 21.98% | 1.83%    | 2.75%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Septiembre | 21.98% | 1.83%    | 2.75%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Octubre    | 21.15% | 1.76%    | 2.64%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Noviembre  | 20.96% | 1.75%    | 2.62%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2017                  | Diciembre  | 20.77% | 1.73%    | 2.60%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Enero      | 20.69% | 1.72%    | 2.58%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Febrero    | 20.69% | 1.72%    | 2.58%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Marzo      | 20.69% | 1.72%    | 2.58%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Abril      | 20.48% | 1.71%    | 2.56%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Mayo       | 20.48% | 1.71%    | 2.56%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Junio      | 20.48% | 1.71%    | 2.56%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Julio      | 20.03% | 1.70%    | 2.49%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Agosto     | 19.94% | 1.66%    | 2.47%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Septiembre | 19.81% | 1.65%    | 2.47%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Octubre    | 19.63% | 1.64%    | 2.45%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Noviembre  | 19.48% | 1.62%    | 2.44%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2018                  | Diciembre  | 19.40% | 1.62%    | 2.43%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Enero      | 19.16% | 1.60%    | 2.40%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Febrero    | 19.70% | 1.64%    | 2.46%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Marzo      | 19.37% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Abril      | 19.32% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Mayo       | 19.34% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Junio      | 19.32% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Julio      | 19.26% | 1.61%    | 2.41%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Agosto     | 19.32% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Septiembre | 19.32% | 1.61%    | 2.42%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Octubre    | 19.10% | 1.59%    | 2.39%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Noviembre  | 19.03% | 1.58%    | 2.38%   | 0     | 0   | 0.00% | 0.00%   | \$ 0       |                 |                           |
| 2019                  | Diciembre  | 18.81% | 1.58%    | 2.36%   | 21    | 1   | 1.65% | 0.00%   | \$ 132,370 |                 |                           |
| 2020                  | Enero      | 18.77% | 1.56%    | 2.35%   | 31    | 2   | 2.42% | 0.00%   | \$ 193,957 |                 |                           |
| 2020                  | Febrero    | 19.06% | 1.59%    | 2.38%   | 28    | 2   | 2.22% | 0.00%   | \$ 177,893 |                 |                           |
| 2020                  | Marzo      | 18.95% | 1.58%    | 2.37%   | 31    | 2   | 2.45% | 0.00%   | \$ 195,817 |                 |                           |
| 2020                  | Abril      | 18.69% | 1.56%    | 2.34%   | 30    | 2   | 2.34% | 0.00%   | \$ 186,900 |                 |                           |
| 2020                  | Mayo       | 18.69% | 1.56%    | 2.27%   | 31    | 2   | 2.35% | 0.00%   | \$ 187,983 |                 |                           |
| 2020                  | Junio      | 18.12% | 1.51%    | 2.27%   | 30    | 2   | 2.27% | 0.00%   | \$ 181,200 |                 |                           |
| 2020                  | Julio      | 18.12% | 1.51%    | 2.27%   | 31    | 2   | 2.33% | 0.00%   | \$ 187,653 |                 |                           |
| 2020                  | Agosto     | 18.29% | 1.52%    | 2.28%   | 31    | 2   | 2.36% | 0.00%   | \$ 188,897 |                 |                           |
| 2020                  | Septiembre | 18.35% | 1.53%    | 2.29%   | 30    | 2   | 2.29% | 0.00%   | \$ 183,500 |                 |                           |
| 2020                  | Octubre    | 18.09% | 1.51%    | 2.26%   | 31    | 2   | 2.34% | 0.00%   | \$ 186,830 |                 |                           |
| 2020                  | Noviembre  | 17.84% | 1.46%    | 2.23%   | 30    | 2   | 2.23% | 0.00%   | \$ 178,400 |                 |                           |
| 2020                  | Diciembre  | 17.46% | 1.46%    | 2.22%   | 31    | 2   | 2.28% | 0.00%   | \$ 183,520 |                 |                           |
| 2021                  | Enero      | 17.32% | 1.44%    | 2.17%   | 31    | 2   | 2.24% | 0.00%   | \$ 178,973 |                 |                           |
| 2021                  | Febrero    | 17.54% | 1.46%    | 2.19%   | 28    | 2   | 2.05% | 0.00%   | \$ 163,707 |                 |                           |
| 2021                  | Marzo      | 17.41% | 1.45%    | 2.18%   | 31    | 2   | 2.25% | 0.00%   | \$ 179,903 |                 |                           |
| 2021                  | Abril      | 17.31% | 1.44%    | 2.16%   | 30    | 2   | 2.16% | 0.00%   | \$ 173,100 |                 |                           |
| 2021                  | Mayo       | 17.22% | 1.44%    | 2.15%   | 31    | 2   | 2.22% | 0.00%   | \$ 177,940 |                 |                           |
| 2021                  | Junio      | 17.21% | 1.43%    | 2.15%   | 15    | 1   | 1.08% | 0.00%   | \$ 88,050  |                 |                           |