



Dr. **Leonardo Adolfo Cano Amaya**

Abogado

**Asuntos Administrativos, Civiles, Laborales, Comerciales, Penales, de Familia y otros**

San José de Cúcuta N. de S. 02 de marzo de 2022

Señores

**JUZGADO PROMISCOU MUNICIPAL DE PUERTO SANTANDER N. DE S.  
ATT. Honorable Juez, LEONARDO FABIO NIÑO CHIA  
E. S. D.**

**ASUNTO: MEMORIAL, ACTUALIZACIÓN DE LIQUIDACIÓN DE CREDITO.**

**REF.: PROCESO EJECUTIVO SINGULAR DE MINIMA CUANTIA.**

**Demandante: EDINSON SANCHEZ YANEZ.**

**Demandado: LUIS ENRIQUE DUARTE MORENO.**

**RAD. 2021-0046**

**LEONARDO ADOLFO CANO AMAYA**, mayor de edad, ciudadano en ejercicio, domiciliado y residente en la ciudad de Cúcuta N. de S., identificado con cedula de ciudadanía No.88.283.351 de Ocaña, abogado titulado en ejercicio, portador de la Tarjeta Profesional N° 258756 del Consejo Superior de la Judicatura, obrando en mi condición de apoderado especial del señor **EDINSON SANCHEZ YANEZ**, identificado con cedula de ciudadanía No. 1.092.351.246, en virtud del poder judicial a mi conferido atendiendo a lo expuesto en el auto del 01 de septiembre del 2021 por este despacho referente al mandamiento de pago a favor de mí prohijado, por medio del presente escrito procedo a presentar la correspondiente liquidación del crédito actualizada del proceso de la referencia para los fines pertinentes: conforme lo establece el art. No. 446 C.G.P. y art. 366 C.G.P.

|                                 |                     |
|---------------------------------|---------------------|
| VALOR TOTAL CAPITAL=            | \$30.622.000        |
| VALOR TOTAL INTERESES=          | \$19.768.602        |
| VALOR AGENCIAS DEL DERECHO      | \$2.760.000         |
| VALOR TOTAL DE LA LIQUIDACION = | <u>\$53.150.602</u> |

El valor de la liquidación actualizada es de **CINCUENTA Y TRES MILLONES CIENTO CINCUENTA MIL SEICIENTOS DOS PESOS M/C (\$53.150.602)** la cual Honorable Juez usted decidirá y determinará si aprueba o modifica la liquidación.

**SOLICITUD RESPETUOSA:**

Una vez aprobada dicha liquidación por parte de la Honorable Juez, de manera muy respetuosa y comedidamente solicito dar trámite y ordenar el desembolso de los depósitos que se llegaren a encontrar a la fecha de este Memorial, abonados en la cuenta judicial del BANCO AGRARIO el cual se encuentra constituidos en el proceso de referencia.

**ANEXO:** liquidaciones de las facturas desde el momento del vencimiento hasta la fecha dejados de percibir a favor de mi poderdante.

De la señora juez,

Atentamente, sírvase conocer Honorable Juez,

**DIAGONAL SANTANDER No.8-72 BARRIO LATINO PRIMER PISO CEL.310 3053591  
CUCUTA N. DE S. email: leodance4@hotmail.com**



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**LEONARDO ADOLFO CANO AMAYA**  
C.C. No.88.283.351 de Ocaña  
T.P. No.258756 del Consejo Superior de la Judicatura

| LETRA DE CAMBIO No.001 |            |             |            |              |              |           |           |
|------------------------|------------|-------------|------------|--------------|--------------|-----------|-----------|
| VENCIMIENTO            | HASTA      | VALOR LETRA | TASA ANUAL | TASA MENSUAL | DIAS DE MORA | V/INTERES | TOTAL     |
| 29/03/2019             | 31/03/2019 | 1.100.000   | 29,06%     | 2,42%        | 2            | 1.775     | 1.101.775 |
| 1/04/2019              | 30/04/2019 | 1.100.000   | 28,98%     | 2,42%        | 30           | 26.565    | 1.126.565 |
| 1/05/2019              | 31/05/2019 | 1.100.000   | 29,01%     | 2,42%        | 31           | 27.479    | 1.127.479 |
| 1/06/2019              | 30/06/2019 | 1.100.000   | 28,95%     | 2,41%        | 30           | 26.538    | 1.126.538 |
| 1/07/2019              | 31/07/2019 | 1.100.000   | 28,92%     | 2,41%        | 31           | 27.394    | 1.127.394 |
| 1/08/2019              | 30/08/2019 | 1.100.000   | 28,98%     | 2,42%        | 30           | 26.565    | 1.126.565 |
| 1/09/2019              | 30/09/2019 | 1.100.000   | 28,98%     | 2,42%        | 30           | 26.565    | 1.126.565 |
| 1/10/2019              | 31/10/2019 | 1.100.000   | 28,95%     | 2,41%        | 31           | 27.422    | 1.127.422 |
| 1/11/2019              | 30/11/2019 | 1.100.000   | 28,55%     | 2,38%        | 30           | 26.171    | 1.126.171 |
| 1/12/2019              | 31/12/2019 | 1.100.000   | 28,37%     | 2,36%        | 31           | 26.873    | 1.126.873 |
| 1/01/2020              | 31/01/2020 | 1.100.000   | 28,16%     | 2,35%        | 31           | 26.674    | 1.126.674 |
| 1/02/2020              | 29/02/2020 | 1.100.000   | 28,59%     | 2,38%        | 29           | 25.334    | 1.125.334 |
| 1/03/2020              | 31/03/2020 | 1.100.000   | 28,43%     | 2,37%        | 31           | 26.930    | 1.126.930 |
| 1/04/2020              | 30/04/2020 | 1.100.000   | 29,01%     | 2,42%        | 30           | 26.593    | 1.126.593 |
| 1/05/2020              | 31/05/2020 | 1.100.000   | 27,29%     | 2,27%        | 31           | 25.850    | 1.125.850 |
| 1/06/2020              | 30/06/2020 | 1.100.000   | 27,18%     | 2,27%        | 30           | 24.915    | 1.124.915 |
| 1/07/2020              | 31/07/2020 | 1.100.000   | 27,18%     | 2,27%        | 31           | 25.746    | 1.125.746 |
| 1/08/2020              | 30/08/2020 | 1.100.000   | 27,44%     | 2,29%        | 30           | 25.153    | 1.125.153 |
| 1/09/2020              | 30/09/2020 | 1.100.000   | 27,52%     | 2,29%        | 30           | 25.227    | 1.125.227 |
| 1/10/2020              | 31/10/2020 | 1.100.000   | 27,14%     | 2,26%        | 31           | 25.708    | 1.125.708 |
| 1/11/2020              | 30/11/2020 | 1.100.000   | 26,76%     | 2,23%        | 30           | 24.530    | 1.124.530 |
| 1/12/2020              | 31/12/2020 | 1.100.000   | 26,19%     | 2,18%        | 31           | 24.808    | 1.124.808 |
| 1/01/2021              | 31/01/2021 | 1.100.000   | 25,98%     | 2,17%        | 31           | 24.609    | 1.124.609 |
| 1/02/2021              | 28/02/2021 | 1.100.000   | 26,31%     | 2,19%        | 28           | 22.510    | 1.122.510 |
| 1/03/2021              | 31/03/2021 | 1.100.000   | 26,31%     | 2,19%        | 31           | 24.921    | 1.124.921 |
| 1/04/2021              | 30/04/2021 | 1.100.000   | 26,12%     | 2,18%        | 30           | 23.943    | 1.123.943 |
| 1/05/2021              | 31/05/2021 | 1.100.000   | 25,83%     | 2,15%        | 31           | 24.467    | 1.124.467 |
| 1/06/2021              | 30/06/2021 | 1.100.000   | 25,82%     | 2,15%        | 30           | 23.668    | 1.123.668 |
| 1/07/2021              | 31/07/2021 | 1.100.000   | 25,77%     | 2,15%        | 31           | 24.410    | 1.124.410 |
| 1/08/2021              | 31/08/2021 | 1.100.000   | 25,86%     | 2,16%        | 31           | 24.495    | 1.124.495 |
| 1/09/2021              | 30/09/2021 | 1.100.000   | 25,79%     | 2,15%        | 30           | 23.641    | 1.123.641 |
| 1/10/2021              | 31/10/2021 | 1.100.000   | 25,62%     | 2,14%        | 31           | 24.268    | 1.124.268 |
| 1/11/2021              | 30/11/2021 | 1.100.000   | 25,91%     | 2,16%        | 30           | 23.751    | 1.123.751 |
| 1/12/2021              | 31/12/2021 | 1.100.000   | 26,19%     | 2,18%        | 31           | 24.808    | 1.124.808 |
| 1/01/2022              | 31/01/2022 | 1.100.000   | 26,49%     | 2,21%        | 31           | 25.092    | 1.125.092 |
| 1/02/2022              | 28/02/2022 | 1.100.000   | 27,45%     | 2,29%        | 28           | 23.485    | 1.123.485 |
|                        |            |             |            | TOTAL        | 1065         | 888.878   | 1.988.878 |

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**Abogado**  
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| LETRA DE CAMBIO No.002 |            |             |            |              |              |            |            |
|------------------------|------------|-------------|------------|--------------|--------------|------------|------------|
| VENCIMIENTO            | HASTA      | VALOR LETRA | TASA ANUAL | TASA MENSUAL | DIAS DE MORA | V/INTERES  | TOTAL      |
| 15/11/2019             | 30/11/2019 | 29.522.000  | 28,55%     | 2,38%        | 15           | 351.189    | 29.873.189 |
| 1/12/2019              | 31/12/2019 | 29.522.000  | 28,37%     | 2,36%        | 31           | 721.214    | 30.243.214 |
| 1/01/2020              | 31/01/2020 | 29.522.000  | 28,16%     | 2,35%        | 31           | 715.876    | 30.237.876 |
| 1/02/2020              | 29/02/2020 | 29.522.000  | 28,59%     | 2,38%        | 29           | 679.916    | 30.201.916 |
| 1/03/2020              | 31/03/2020 | 29.522.000  | 28,43%     | 2,37%        | 31           | 722.740    | 30.244.740 |
| 1/04/2020              | 30/04/2020 | 29.522.000  | 29,01%     | 2,42%        | 30           | 713.694    | 30.235.694 |
| 1/05/2020              | 31/05/2020 | 29.522.000  | 27,29%     | 2,27%        | 31           | 693.759    | 30.215.759 |
| 1/06/2020              | 30/06/2020 | 29.522.000  | 27,18%     | 2,27%        | 30           | 668.673    | 30.190.673 |
| 1/07/2020              | 31/07/2020 | 29.522.000  | 27,18%     | 2,27%        | 31           | 690.962    | 30.212.962 |
| 1/08/2020              | 30/08/2020 | 29.522.000  | 27,44%     | 2,29%        | 30           | 675.070    | 30.197.070 |
| 1/09/2020              | 30/09/2020 | 29.522.000  | 27,52%     | 2,29%        | 30           | 677.038    | 30.199.038 |
| 1/10/2020              | 7/10/2020  | 29.522.000  | 27,14%     | 2,26%        | 31           | 689.946    | 30.211.946 |
| 1/11/2020              | 30/11/2020 | 29.522.000  | 26,76%     | 2,23%        | 30           | 658.341    | 30.180.341 |
| 1/12/2020              | 31/12/2020 | 29.522.000  | 26,19%     | 2,18%        | 31           | 665.795    | 30.187.795 |
| 1/01/2021              | 31/01/2021 | 29.522.000  | 25,98%     | 2,17%        | 31           | 660.456    | 30.182.456 |
| 1/02/2021              | 28/02/2021 | 29.522.000  | 26,31%     | 2,19%        | 28           | 604.119    | 30.126.119 |
| 1/03/2021              | 31/03/2021 | 29.522.000  | 26,31%     | 2,19%        | 31           | 668.846    | 30.190.846 |
| 1/04/2021              | 30/04/2021 | 29.522.000  | 26,12%     | 2,18%        | 30           | 642.596    | 30.164.596 |
| 1/05/2021              | 31/05/2021 | 29.522.000  | 25,83%     | 2,15%        | 31           | 656.643    | 30.178.643 |
| 1/06/2021              | 15/06/2021 | 29.522.000  | 25,82%     | 2,15%        | 15           | 317.608    | 29.839.608 |
| 1/07/2021              | 31/07/2021 | 29.522.000  | 25,77%     | 2,15%        | 31           | 655.118    | 30.177.118 |
| 1/08/2021              | 31/08/2021 | 29.522.000  | 25,86%     | 2,16%        | 31           | 657.406    | 30.179.406 |
| 1/09/2021              | 30/09/2021 | 29.522.000  | 25,79%     | 2,15%        | 30           | 634.477    | 30.156.477 |
| 1/10/2021              | 31/10/2021 | 29.522.000  | 25,62%     | 2,14%        | 31           | 651.305    | 30.173.305 |
| 1/11/2021              | 30/11/2021 | 29.522.000  | 25,91%     | 2,16%        | 30           | 637.429    | 30.159.429 |
| 1/12/2021              | 31/12/2021 | 29.522.000  | 26,19%     | 2,18%        | 31           | 665.795    | 30.187.795 |
| 1/01/2022              | 31/01/2022 | 29.522.000  | 26,49%     | 2,21%        | 31           | 673.421    | 30.195.421 |
| 1/02/2022              | 28/02/2022 | 29.522.000  | 27,45%     | 2,29%        | 28           | 630.295    | 30.152.295 |
|                        |            |             |            | TOTAL        | 820          | 18.079.724 | 47.601.724 |

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**Doctor**  
**LEONARDO FABIO NIÑO**  
**JUEZ PROMISCOU MUNICIPAL DE PUERTO SANTANDER**  
**E.S.D.**

**RADICADO: 2019-00008.**  
**DEMANDANTE: BANCO AGRARIO DE COLOMBIA S.A.**  
**DEMANDADO: JONN DARIO SUAREZ ECHEVERRY C.C 88.187.331**

En mi calidad de apoderado judicial de la parte demandante en el proceso de la referencia, me permito allegar a su Honorable Despacho la liquidación de crédito, acorde con el mandamiento de pago, y el auto que ordena seguir adelante la ejecución, lo anterior de conformidad con el Artículo 446 del C.G.P.

- Por el pagare No. **051016100015947** que respalda la obligación No. **725051010253376:**

| DESDE    | HASTA    | TASA  | 1/2 INT. | PERIODO | DÍAS | CAPITAL      | INTERÉS | ABONO | SALDO (capital + interés) |
|----------|----------|-------|----------|---------|------|--------------|---------|-------|---------------------------|
| 27/01/18 | 30/01/18 | 20,69 | 10,35    | 2,59%   | 3    | 2.291.625,00 | 5.935   |       | 2.297.560,31              |
| 01/02/18 | 28/02/18 | 21,01 | 10,51    | 2,63%   | 30   | 2.291.625,00 | 60.270  |       | 2.357.830,05              |
| 01/03/18 | 30/03/18 | 20,68 | 10,34    | 2,59%   | 30   | 2.291.625,00 | 59.353  |       | 2.417.183,13              |
| 01/04/18 | 30/04/18 | 20,48 | 10,24    | 2,56%   | 30   | 2.291.625,00 | 58.666  |       | 2.475.848,73              |
| 01/05/18 | 30/05/18 | 20,44 | 10,22    | 2,56%   | 30   | 2.291.625,00 | 58.666  |       | 2.534.514,33              |
| 01/06/18 | 30/06/18 | 20,28 | 10,14    | 2,54%   | 30   | 2.291.625,00 | 58.207  |       | 2.592.721,61              |
| 01/07/18 | 30/07/18 | 20,03 | 10,02    | 2,50%   | 30   | 2.291.625,00 | 57.291  |       | 2.650.012,23              |
| 01/08/18 | 30/08/18 | 19,94 | 9,97     | 2,49%   | 30   | 2.291.625,00 | 57.061  |       | 2.707.073,70              |
| 01/09/18 | 30/09/18 | 19,81 | 9,91     | 2,48%   | 30   | 2.291.625,00 | 56.832  |       | 2.763.906,00              |
| 01/10/18 | 30/10/18 | 19,63 | 9,82     | 2,45%   | 30   | 2.291.625,00 | 56.145  |       | 2.820.050,81              |
| 01/11/18 | 30/11/18 | 19,49 | 9,75     | 2,44%   | 30   | 2.291.625,00 | 55.916  |       | 2.875.966,46              |
| 01/12/18 | 30/12/18 | 19,40 | 9,70     | 2,43%   | 30   | 2.291.625,00 | 55.686  |       | 2.931.652,95              |
| 01/01/19 | 30/01/19 | 19,16 | 9,58     | 2,40%   | 30   | 2.291.625,00 | 54.999  |       | 2.986.651,95              |
| 01/02/19 | 28/02/19 | 19,70 | 9,85     | 2,46%   | 30   | 2.291.625,00 | 56.374  |       | 3.043.025,92              |
| 01/03/19 | 30/03/19 | 19,37 | 9,69     | 2,42%   | 30   | 2.291.625,00 | 55.457  |       | 3.098.483,25              |
| 01/04/19 | 30/04/19 | 19,32 | 9,66     | 2,42%   | 30   | 2.291.625,00 | 55.457  |       | 3.153.940,57              |
| 01/05/19 | 30/05/19 | 19,34 | 9,67     | 2,42%   | 30   | 2.291.625,00 | 55.457  |       | 3.209.397,90              |
| 01/06/19 | 30/06/19 | 19,30 | 9,65     | 2,41%   | 30   | 2.291.625,00 | 55.228  |       | 3.264.626,06              |
| 01/07/19 | 30/07/19 | 19,28 | 9,64     | 2,41%   | 30   | 2.291.625,00 | 55.228  |       | 3.319.854,22              |
| 01/08/19 | 30/08/19 | 19,32 | 9,66     | 2,42%   | 30   | 2.291.625,00 | 55.457  |       | 3.375.311,55              |
| 01/09/19 | 30/09/19 | 19,32 | 9,66     | 2,42%   | 30   | 2.291.625,00 | 55.457  |       | 3.430.768,87              |
| 01/10/19 | 31/10/19 | 19,10 | 9,55     | 2,39%   | 30   | 2.291.625,00 | 54.770  |       | 3.485.538,71              |
| 01/11/19 | 30/11/19 | 19,03 | 9,52     | 2,38%   | 30   | 2.291.625,00 | 54.541  |       | 3.540.079,38              |
| 01/12/19 | 31/12/19 | 18,91 | 9,46     | 2,36%   | 30   | 2.291.625,00 | 54.082  |       | 3.594.161,73              |
| 01/01/20 | 31/01/20 | 18,77 | 9,39     | 2,35%   | 30   | 2.291.625,00 | 53.853  |       | 3.648.014,92              |
| 01/02/20 | 29/02/20 | 19,06 | 9,53     | 2,38%   | 30   | 2.291.625,00 | 54.541  |       | 3.702.555,60              |
| 01/03/20 | 31/03/20 | 18,95 | 9,48     | 2,37%   | 30   | 2.291.625,00 | 54.312  |       | 3.756.867,11              |
| 01/04/20 | 30/04/20 | 18,69 | 9,35     | 2,34%   | 30   | 2.291.625,00 | 53.624  |       | 3.810.491,13              |
| 01/05/20 | 31/05/20 | 18,19 | 9,10     | 2,27%   | 30   | 2.291.625,00 | 52.020  |       | 3.862.511,02              |
| 01/06/20 | 30/06/20 | 18,12 | 9,06     | 2,27%   | 30   | 2.291.625,00 | 52.020  |       | 3.914.530,91              |
| 01/07/20 | 31/07/20 | 18,12 | 9,06     | 2,27%   | 30   | 2.291.625,00 | 52.020  |       | 3.966.550,80              |
| 01/08/20 | 31/08/20 | 18,29 | 9,15     | 2,29%   | 30   | 2.291.625,00 | 52.478  |       | 4.019.029,01              |
| 01/09/20 | 30/09/20 | 18,35 | 9,18     | 2,29%   | 30   | 2.291.625,00 | 52.478  |       | 4.071.507,22              |
| 01/10/20 | 31/10/20 | 18,09 | 9,05     | 2,26%   | 30   | 2.291.625,00 | 51.791  |       | 4.123.297,95              |
| 01/11/20 | 30/11/20 | 17,84 | 8,92     | 2,23%   | 30   | 2.291.625,00 | 51.103  |       | 4.174.401,18              |
| 01/12/20 | 31/12/20 | 17,46 | 8,73     | 2,18%   | 30   | 2.291.625,00 | 49.957  |       | 4.224.358,61              |
| 01/01/21 | 31/01/21 | 17,32 | 8,66     | 2,17%   | 30   | 2.291.625,00 | 49.728  |       | 4.274.086,87              |
| 01/02/21 | 28/02/21 | 17,54 | 8,77     | 2,19%   | 30   | 2.291.625,00 | 50.187  |       | 4.324.273,46              |
| 01/03/21 | 31/03/21 | 17,41 | 8,71     | 2,18%   | 30   | 2.291.625,00 | 49.957  |       | 4.374.230,88              |
| 01/04/21 | 30/04/21 | 17,31 | 8,66     | 2,16%   | 30   | 2.291.625,00 | 49.499  |       | 4.423.729,98              |
| 01/05/21 | 31/05/21 | 17,22 | 8,61     | 2,15%   | 30   | 2.291.625,00 | 49.270  |       | 4.472.999,92              |
| 01/06/21 | 30/06/21 | 17,21 | 8,61     | 2,15%   | 30   | 2.291.625,00 | 49.270  |       | 4.522.269,86              |
| 01/07/21 | 31/07/21 | 17,18 | 8,59     | 2,15%   | 30   | 2.291.625,00 | 49.270  |       | 4.571.539,80              |

|           |          |       |      |       |    |              |              |      |                     |
|-----------|----------|-------|------|-------|----|--------------|--------------|------|---------------------|
| 01/08/21  | 31/08/21 | 17,24 | 8,62 | 2,16% | 30 | 2.291.625,00 | 49.499       |      | 4.621.038,90        |
| 01/09/21  | 30/09/21 | 17,19 | 8,60 | 2,15% | 30 | 2.291.625,00 | 49.270       |      | 4.670.308,83        |
| 01/10/21  | 31/10/21 | 17,08 | 8,54 | 2,14% | 30 | 2.291.625,00 | 49.041       |      | 4.719.349,61        |
| 01/11/21  | 30/11/21 | 17,27 | 8,64 | 2,16% | 30 | 2.291.625,00 | 49.499       |      | 4.768.848,71        |
| 01/12/21  | 31/12/21 | 17,46 | 8,73 | 2,18% | 30 | 2.291.625,00 | 49.957       |      | 4.818.806,13        |
| 01/01/22  | 31/01/22 | 17,66 | 8,83 | 2,21% | 30 | 2.291.625,00 | 50.645       |      | 4.869.451,05        |
| 01/02/22  | 28/02/22 | 18,30 | 9,15 | 2,29% | 30 | 2.291.625,00 | 52.478       |      | 4.921.929,26        |
| 01/03/22  | 31/03/22 | 18,47 | 9,24 | 2,31% | 30 | 2.291.625,00 | 52.937       |      | <b>4.974.865,80</b> |
| TOTALES = |          |       |      |       |    |              | 2.685.089,37 | 0,00 | <b>4.974.865,80</b> |

|                       |                     |
|-----------------------|---------------------|
| TITULO VALOR          | \$ 2.291.625,00     |
| INTERESES DE MORA     | \$ 2.685.089,37     |
| INTERESES DE PLAZO    | \$ 325.917          |
| OTROS CONCEPTOS       | \$ 12.850           |
| ABONOS                | 0,00                |
| <b>TOTAL ADEUDADO</b> | <b>5.315.481,37</b> |

- Por el pagare No. **4481870000412243** que respalda la obligación No. **4481870000412243**:

| DESDE    | HASTA    | TASA  | 1/2 INT. | PERIODO | DÍAS | CAPITAL      | INTERÉS | ABONO | SALDO (capital + interés) |
|----------|----------|-------|----------|---------|------|--------------|---------|-------|---------------------------|
| 22/05/18 | 30/05/18 | 20,44 | 10,22    | 2,56%   | 8    | 3.739.703,00 | 25.530  |       | 3.765.232,71              |
| 01/06/18 | 30/06/18 | 20,28 | 10,14    | 2,54%   | 30   | 3.739.703,00 | 94.988  |       | 3.860.221,16              |
| 01/07/18 | 30/07/18 | 20,03 | 10,02    | 2,50%   | 30   | 3.739.703,00 | 93.493  |       | 3.953.713,74              |
| 01/08/18 | 30/08/18 | 19,94 | 9,97     | 2,49%   | 30   | 3.739.703,00 | 93.119  |       | 4.046.832,34              |
| 01/09/18 | 30/09/18 | 19,81 | 9,91     | 2,48%   | 30   | 3.739.703,00 | 92.745  |       | 4.139.576,98              |
| 01/10/18 | 30/10/18 | 19,63 | 9,82     | 2,45%   | 30   | 3.739.703,00 | 91.623  |       | 4.231.199,70              |
| 01/11/18 | 30/11/18 | 19,49 | 9,75     | 2,44%   | 30   | 3.739.703,00 | 91.249  |       | 4.322.448,45              |
| 01/12/18 | 30/12/18 | 19,40 | 9,70     | 2,43%   | 30   | 3.739.703,00 | 90.875  |       | 4.413.323,24              |
| 01/01/19 | 30/01/19 | 19,16 | 9,58     | 2,40%   | 30   | 3.739.703,00 | 89.753  |       | 4.503.076,11              |
| 01/02/19 | 28/02/19 | 19,70 | 9,85     | 2,46%   | 30   | 3.739.703,00 | 91.997  |       | 4.595.072,80              |
| 01/03/19 | 30/03/19 | 19,37 | 9,69     | 2,42%   | 30   | 3.739.703,00 | 90.501  |       | 4.685.573,61              |
| 01/04/19 | 30/04/19 | 19,32 | 9,66     | 2,42%   | 30   | 3.739.703,00 | 90.501  |       | 4.776.074,43              |
| 01/05/19 | 30/05/19 | 19,34 | 9,67     | 2,42%   | 30   | 3.739.703,00 | 90.501  |       | 4.866.575,24              |
| 01/06/19 | 30/06/19 | 19,30 | 9,65     | 2,41%   | 30   | 3.739.703,00 | 90.127  |       | 4.956.702,08              |
| 01/07/19 | 30/07/19 | 19,28 | 9,64     | 2,41%   | 30   | 3.739.703,00 | 90.127  |       | 5.046.828,92              |
| 01/08/19 | 30/08/19 | 19,32 | 9,66     | 2,42%   | 30   | 3.739.703,00 | 90.501  |       | 5.137.329,74              |
| 01/09/19 | 30/09/19 | 19,32 | 9,66     | 2,42%   | 30   | 3.739.703,00 | 90.501  |       | 5.227.830,55              |
| 01/10/19 | 31/10/19 | 19,10 | 9,55     | 2,39%   | 30   | 3.739.703,00 | 89.379  |       | 5.317.209,45              |
| 01/11/19 | 30/11/19 | 19,03 | 9,52     | 2,38%   | 30   | 3.739.703,00 | 89.005  |       | 5.406.214,38              |
| 01/12/19 | 31/12/19 | 18,91 | 9,46     | 2,36%   | 30   | 3.739.703,00 | 88.257  |       | 5.494.471,37              |
| 01/01/20 | 31/01/20 | 18,77 | 9,39     | 2,35%   | 30   | 3.739.703,00 | 87.883  |       | 5.582.354,39              |
| 01/02/20 | 29/02/20 | 19,06 | 9,53     | 2,38%   | 30   | 3.739.703,00 | 89.005  |       | 5.671.359,32              |
| 01/03/20 | 31/03/20 | 18,95 | 9,48     | 2,37%   | 30   | 3.739.703,00 | 88.631  |       | 5.759.990,29              |
| 01/04/20 | 30/04/20 | 18,69 | 9,35     | 2,34%   | 30   | 3.739.703,00 | 87.509  |       | 5.847.499,34              |
| 01/05/20 | 31/05/20 | 18,19 | 9,10     | 2,27%   | 30   | 3.739.703,00 | 84.891  |       | 5.932.390,59              |
| 01/06/20 | 30/06/20 | 18,12 | 9,06     | 2,27%   | 30   | 3.739.703,00 | 84.891  |       | 6.017.281,85              |
| 01/07/20 | 31/07/20 | 18,12 | 9,06     | 2,27%   | 30   | 3.739.703,00 | 84.891  |       | 6.102.173,11              |
| 01/08/20 | 31/08/20 | 18,29 | 9,15     | 2,29%   | 30   | 3.739.703,00 | 85.639  |       | 6.187.812,31              |
| 01/09/20 | 30/09/20 | 18,35 | 9,18     | 2,29%   | 30   | 3.739.703,00 | 85.639  |       | 6.273.451,51              |
| 01/10/20 | 31/10/20 | 18,09 | 9,05     | 2,26%   | 30   | 3.739.703,00 | 84.517  |       | 6.357.968,80              |
| 01/11/20 | 30/11/20 | 17,84 | 8,92     | 2,23%   | 30   | 3.739.703,00 | 83.395  |       | 6.441.364,17              |
| 01/12/20 | 31/12/20 | 17,46 | 8,73     | 2,18%   | 30   | 3.739.703,00 | 81.526  |       | 6.522.889,70              |
| 01/01/21 | 31/01/21 | 17,32 | 8,66     | 2,17%   | 30   | 3.739.703,00 | 81.152  |       | 6.604.041,25              |
| 01/02/21 | 28/02/21 | 17,54 | 8,77     | 2,19%   | 30   | 3.739.703,00 | 81.899  |       | 6.685.940,75              |
| 01/03/21 | 31/03/21 | 17,41 | 8,71     | 2,18%   | 30   | 3.739.703,00 | 81.526  |       | 6.767.466,27              |
| 01/04/21 | 30/04/21 | 17,31 | 8,66     | 2,16%   | 30   | 3.739.703,00 | 80.778  |       | 6.848.243,86              |
| 01/05/21 | 31/05/21 | 17,22 | 8,61     | 2,15%   | 30   | 3.739.703,00 | 80.404  |       | 6.928.647,47              |
| 01/06/21 | 30/06/21 | 17,21 | 8,61     | 2,15%   | 30   | 3.739.703,00 | 80.404  |       | 7.009.051,09              |
| 01/07/21 | 31/07/21 | 17,18 | 8,59     | 2,15%   | 30   | 3.739.703,00 | 80.404  |       | 7.089.454,70              |

|           |          |       |      |       |    |              |                     |             |                     |
|-----------|----------|-------|------|-------|----|--------------|---------------------|-------------|---------------------|
| 01/08/21  | 31/08/21 | 17,24 | 8,62 | 2,16% | 30 | 3.739.703,00 | 80.778              |             | 7.170.232,29        |
| 01/09/21  | 30/09/21 | 17,19 | 8,60 | 2,15% | 30 | 3.739.703,00 | 80.404              |             | 7.250.635,90        |
| 01/10/21  | 31/10/21 | 17,08 | 8,54 | 2,14% | 30 | 3.739.703,00 | 80.030              |             | 7.330.665,55        |
| 01/11/21  | 30/11/21 | 17,27 | 8,64 | 2,16% | 30 | 3.739.703,00 | 80.778              |             | 7.411.443,13        |
| 01/12/21  | 31/12/21 | 17,46 | 8,73 | 2,18% | 30 | 3.739.703,00 | 81.526              |             | 7.492.968,66        |
| 01/01/22  | 31/01/22 | 17,66 | 8,83 | 2,21% | 30 | 3.739.703,00 | 82.647              |             | 7.575.616,09        |
| 01/02/22  | 28/02/22 | 18,30 | 9,15 | 2,29% | 30 | 3.739.703,00 | 85.639              |             | 7.661.255,29        |
| 01/03/22  | 31/03/22 | 18,47 | 9,24 | 2,31% | 30 | 3.739.703,00 | 86.387              |             | <b>7.747.642,43</b> |
| TOTALES = |          |       |      |       |    |              | <b>4.010.956,12</b> | <b>0,00</b> | <b>7.747.642,43</b> |

|                       |                     |
|-----------------------|---------------------|
| TITULO VALOR          | \$ 3.739.703,00     |
| INTERESES DE MORA     | \$ 4.010.956,12     |
| INTERESES DE PLAZO    | \$ 250.754          |
| OTROS CONCEPTOS       | \$ 0                |
| ABONOS                | 0,00                |
| <b>TOTAL ADEUDADO</b> | <b>8.001.413,12</b> |

El Total adeudado a la fecha es de **TRECE MILLONES TRESCIENTOS DIECISEIS MIL OCHOCIENTOS NOVENTA Y CUATRO PESOS M/CTE (\$13.316.894,49).**

Solicito se le corra traslado de conformidad con el articulo 110 C.G.P., y si no es objetada se proceda a su aprobaci3n.

Atentamente,



**VIVIANA ROCIO RIVERA MANTILLA**  
**C.C. 1.090.401.537 de Cúcuta**  
**T.P. 213.079 del C.S. de la J.**



Doctor  
LEONARDO FABIO NIÑO  
JUEZ PROMISCUO MUNICIPAL DE PUERTO SANTANDER  
E.S.D.

RADICADO: 2020-00101.  
DEMANDANTE: BANCO AGRARIO DE COLOMBIA S.A.  
DEMANDADO: SANDRA JOHANNA CAVANZO C.C 37.752.684

En mi calidad de apoderado judicial de la parte demandante en el proceso de la referencia, me permito allegar a su Honorable Despacho la liquidación de crédito, acorde con el mandamiento de pago, y el auto que ordena seguir adelante la ejecución, lo anterior de conformidad con el Artículo 446 del C.G.P.

- Por el pagare No. 051056110000022 que respalda la obligación No. 725051050000535:

| DESDE     | HASTA    | TASA  | 1/2 INT. | PERIODO | DÍAS | CAPITAL       | INTERÉS       | ABONO | SALDO (capital + interés) |
|-----------|----------|-------|----------|---------|------|---------------|---------------|-------|---------------------------|
| 06/12/19  | 31/12/19 | 18,91 | 9,46     | 2,36%   | 25   | 20.138.380,00 | 396.055       |       | 20.534.434,81             |
| 01/01/20  | 31/01/20 | 18,77 | 9,39     | 2,35%   | 30   | 20.138.380,00 | 473.252       |       | 21.007.686,74             |
| 01/02/20  | 29/02/20 | 19,06 | 9,53     | 2,38%   | 30   | 20.138.380,00 | 479.293       |       | 21.486.980,18             |
| 01/03/20  | 31/03/20 | 18,95 | 9,48     | 2,37%   | 30   | 20.138.380,00 | 477.280       |       | 21.964.259,79             |
| 01/04/20  | 30/04/20 | 18,69 | 9,35     | 2,34%   | 30   | 20.138.380,00 | 471.238       |       | 22.435.497,88             |
| 01/05/20  | 31/05/20 | 18,19 | 9,10     | 2,27%   | 30   | 20.138.380,00 | 457.141       |       | 22.892.639,10             |
| 01/06/20  | 30/06/20 | 18,12 | 9,06     | 2,27%   | 30   | 20.138.380,00 | 457.141       |       | 23.349.780,33             |
| 01/07/20  | 31/07/20 | 18,12 | 9,06     | 2,27%   | 30   | 20.138.380,00 | 457.141       |       | 23.806.921,56             |
| 01/08/20  | 31/08/20 | 18,29 | 9,15     | 2,29%   | 30   | 20.138.380,00 | 461.169       |       | 24.268.090,46             |
| 01/09/20  | 30/09/20 | 18,35 | 9,18     | 2,29%   | 30   | 20.138.380,00 | 461.169       |       | 24.729.259,36             |
| 01/10/20  | 31/10/20 | 18,09 | 9,05     | 2,26%   | 30   | 20.138.380,00 | 455.127       |       | 25.184.386,75             |
| 01/11/20  | 30/11/20 | 17,84 | 8,92     | 2,23%   | 30   | 20.138.380,00 | 449.086       |       | 25.633.472,62             |
| 01/12/20  | 31/12/20 | 17,46 | 8,73     | 2,18%   | 30   | 20.138.380,00 | 439.017       |       | 26.072.489,31             |
| 01/01/21  | 31/01/21 | 17,32 | 8,66     | 2,17%   | 30   | 20.138.380,00 | 437.003       |       | 26.509.492,15             |
| 01/02/21  | 28/02/21 | 17,54 | 8,77     | 2,19%   | 30   | 20.138.380,00 | 441.031       |       | 26.950.522,67             |
| 01/03/21  | 31/03/21 | 17,41 | 8,71     | 2,18%   | 30   | 20.138.380,00 | 439.017       |       | 27.389.539,36             |
| 01/04/21  | 30/04/21 | 17,31 | 8,66     | 2,16%   | 30   | 20.138.380,00 | 434.989       |       | 27.824.528,37             |
| 01/05/21  | 31/05/21 | 17,22 | 8,61     | 2,15%   | 30   | 20.138.380,00 | 432.975       |       | 28.257.503,54             |
| 01/06/21  | 30/06/21 | 17,21 | 8,61     | 2,15%   | 30   | 20.138.380,00 | 432.975       |       | 28.690.478,71             |
| 01/07/21  | 31/07/21 | 17,18 | 8,59     | 2,15%   | 30   | 20.138.380,00 | 432.975       |       | 29.123.453,88             |
| 01/08/21  | 31/08/21 | 17,24 | 8,62     | 2,16%   | 30   | 20.138.380,00 | 434.989       |       | 29.558.442,88             |
| 01/09/21  | 30/09/21 | 17,19 | 8,60     | 2,15%   | 30   | 20.138.380,00 | 432.975       |       | 29.991.418,05             |
| 01/10/21  | 31/10/21 | 17,08 | 8,54     | 2,14%   | 30   | 20.138.380,00 | 430.961       |       | 30.422.379,39             |
| 01/11/21  | 30/11/21 | 17,27 | 8,64     | 2,16%   | 30   | 20.138.380,00 | 434.989       |       | 30.857.368,39             |
| 01/12/21  | 31/12/21 | 17,46 | 8,73     | 2,18%   | 30   | 20.138.380,00 | 439.017       |       | 31.296.385,08             |
| 01/01/22  | 31/01/22 | 17,66 | 8,83     | 2,21%   | 30   | 20.138.380,00 | 445.058       |       | 31.741.443,28             |
| 01/02/22  | 28/02/22 | 18,30 | 9,15     | 2,29%   | 30   | 20.138.380,00 | 461.169       |       | 32.202.612,18             |
| 01/03/22  | 31/03/22 | 18,47 | 9,24     | 2,31%   | 30   | 20.138.380,00 | 465.197       |       | 32.667.808,76             |
| TOTALES = |          |       |          |         |      |               | 12.545.673,72 | 0,00  | 32.667.808,76             |

|                    |                 |
|--------------------|-----------------|
| TITULO VALOR       | \$20.138.380,00 |
| INTERESES DE MORA  | \$12.545.673,72 |
| INTERESES DE PLAZO | \$ 2.046.502    |
| OTROS CONCEPTOS    | \$ 905.775      |
| ABONOS             | 0,00            |
| TOTAL ADEUDADO     | 35.636.330,72   |

- Por el pagare No. **4481850005429970** que respalda la obligación No. **4481850005429970**:

| DESDE     | HASTA    | TASA  | 1/2 INT. | PERIODO | DÍAS | CAPITAL      | INTERÉS      | ABONO | SALDO (capital + interés) |
|-----------|----------|-------|----------|---------|------|--------------|--------------|-------|---------------------------|
| 21/12/19  | 31/12/19 | 18,91 | 9,46     | 2,36%   | 10   | 2.710.954,00 | 21.326       |       | 2.732.280,17              |
| 01/01/20  | 31/01/20 | 18,77 | 9,39     | 2,35%   | 30   | 2.710.954,00 | 63.707       |       | 2.795.987,59              |
| 01/02/20  | 29/02/20 | 19,06 | 9,53     | 2,38%   | 30   | 2.710.954,00 | 64.521       |       | 2.860.508,30              |
| 01/03/20  | 31/03/20 | 18,95 | 9,48     | 2,37%   | 30   | 2.710.954,00 | 64.250       |       | 2.924.757,91              |
| 01/04/20  | 30/04/20 | 18,69 | 9,35     | 2,34%   | 30   | 2.710.954,00 | 63.436       |       | 2.988.194,23              |
| 01/05/20  | 31/05/20 | 18,19 | 9,10     | 2,27%   | 30   | 2.710.954,00 | 61.539       |       | 3.049.732,88              |
| 01/06/20  | 30/06/20 | 18,12 | 9,06     | 2,27%   | 30   | 2.710.954,00 | 61.539       |       | 3.111.271,54              |
| 01/07/20  | 31/07/20 | 18,12 | 9,06     | 2,27%   | 30   | 2.710.954,00 | 61.539       |       | 3.172.810,20              |
| 01/08/20  | 31/08/20 | 18,29 | 9,15     | 2,29%   | 30   | 2.710.954,00 | 62.081       |       | 3.234.891,04              |
| 01/09/20  | 30/09/20 | 18,35 | 9,18     | 2,29%   | 30   | 2.710.954,00 | 62.081       |       | 3.296.971,89              |
| 01/10/20  | 31/10/20 | 18,09 | 9,05     | 2,26%   | 30   | 2.710.954,00 | 61.268       |       | 3.358.239,45              |
| 01/11/20  | 30/11/20 | 17,84 | 8,92     | 2,23%   | 30   | 2.710.954,00 | 60.454       |       | 3.418.693,72              |
| 01/12/20  | 31/12/20 | 17,46 | 8,73     | 2,18%   | 30   | 2.710.954,00 | 59.099       |       | 3.477.792,52              |
| 01/01/21  | 31/01/21 | 17,32 | 8,66     | 2,17%   | 30   | 2.710.954,00 | 58.828       |       | 3.536.620,22              |
| 01/02/21  | 28/02/21 | 17,54 | 8,77     | 2,19%   | 30   | 2.710.954,00 | 59.370       |       | 3.595.990,12              |
| 01/03/21  | 31/03/21 | 17,41 | 8,71     | 2,18%   | 30   | 2.710.954,00 | 59.099       |       | 3.655.088,91              |
| 01/04/21  | 30/04/21 | 17,31 | 8,66     | 2,16%   | 30   | 2.710.954,00 | 58.557       |       | 3.713.645,52              |
| 01/05/21  | 31/05/21 | 17,22 | 8,61     | 2,15%   | 30   | 2.710.954,00 | 58.286       |       | 3.771.931,03              |
| 01/06/21  | 30/06/21 | 17,21 | 8,61     | 2,15%   | 30   | 2.710.954,00 | 58.286       |       | 3.830.216,54              |
| 01/07/21  | 31/07/21 | 17,18 | 8,59     | 2,15%   | 30   | 2.710.954,00 | 58.286       |       | 3.888.502,05              |
| 01/08/21  | 31/08/21 | 17,24 | 8,62     | 2,16%   | 30   | 2.710.954,00 | 58.557       |       | 3.947.058,66              |
| 01/09/21  | 30/09/21 | 17,19 | 8,60     | 2,15%   | 30   | 2.710.954,00 | 58.286       |       | 4.005.344,17              |
| 01/10/21  | 31/10/21 | 17,08 | 8,54     | 2,14%   | 30   | 2.710.954,00 | 58.014       |       | 4.063.358,59              |
| 01/11/21  | 30/11/21 | 17,27 | 8,64     | 2,16%   | 30   | 2.710.954,00 | 58.557       |       | 4.121.915,19              |
| 01/12/21  | 31/12/21 | 17,46 | 8,73     | 2,18%   | 30   | 2.710.954,00 | 59.099       |       | 4.181.013,99              |
| 01/01/22  | 31/01/22 | 17,66 | 8,83     | 2,21%   | 30   | 2.710.954,00 | 59.912       |       | 4.240.926,07              |
| 01/02/22  | 28/02/22 | 18,30 | 9,15     | 2,29%   | 30   | 2.710.954,00 | 62.081       |       | 4.303.006,92              |
| 01/03/22  | 31/03/22 | 18,47 | 9,24     | 2,31%   | 30   | 2.710.954,00 | 62.623       |       | 4.365.629,96              |
| TOTALES = |          |       |          |         |      |              | 1.656.862,79 | 0,00  | 4.365.629,96              |

|                    |                 |
|--------------------|-----------------|
| TITULO VALOR       | \$ 2.710.954,00 |
| INTERESES DE MORA  | \$ 1.656.862,79 |
| INTERESES DE PLAZO | \$ 129.369      |
| OTROS CONCEPTOS    | \$ 144.452      |
| ABONOS             | 0,00            |
| TOTAL ADEUDADO     | 4.641.637,79    |

El Total adeudado a la fecha es de **CUARENTA MILLONES DOSCIENTOS SETENTA Y SIETE MIL NOVECIENTOS SESENTA Y OCHO PESOS M/CTE (\$40.277.968,51).**

Solicito se le corra traslado de conformidad con el articulo 110 C.G.P., y si no es objetada se proceda a su aprobación.

Atentamente,



**VIVIANA ROCÍO RIVERA MANTILLA**  
**C.C. 1.090.401.537 de Cúcuta**  
**T.P. 213.079 del C.S. de la J.**





**ABOGADO**  
**DR. JOSÉ IVÁN SOTO ANGARITA.**  
**ESPECIALISTA EN DERECHO EMPRESARIAL Y**  
**ADMINISTRATIVO.**

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San José de Cúcuta, 04 de abril de 2022.

**SEÑORES**

**JUZGADO PROMISCOU MUNICIPAL DE PUERTO SANTANDER.**

**E.**

**S.**

**D.**

|                   |                                       |
|-------------------|---------------------------------------|
| <b>REFERENCIA</b> | <b>EJECUTIVO SINGULAR</b>             |
| <b>DEMANDANTE</b> | <b>BANCO AGRARIO DE COLOMBIA S.A.</b> |
| <b>DEMANDADO</b>  | <b>RAUL ANTONIO CARVAJAL GOMEZ.</b>   |
| <b>RADICADO</b>   | <b>2021-00076.</b>                    |

**JOSE IVAN SOTO ANGARITA**, mayor de edad, domiciliado en Cúcuta, identificado con la cedula No. **13.481.428** Expedida en Cúcuta, Abogado titulado y en ejercicio, con Tarjeta Profesional No. **84914** del Consejo Superior de la Judicatura, En mi condición de apoderado Judicial de **BANCO AGRARIO DE COLOMBIA S.A.**, manifiesto lo siguiente:

De manera atenta y respetuosamente me permito anexar oficio de la actualización de la liquidación de crédito de la **OBLIGACIÓN No. 725051050000545 Y 725051050002475.**

Cordial Saludo,

**JOSE IVAN SOTO ANGARITA.**  
**C.C. NO. 13.481.428 de Cúcuta.**  
**T.P No. 84914 del C.S de la J.**



**Banco Agrario  
de Colombia**

OBLIGACION No. 725051050000545

REFERENCIA: LIQUIDACION DE CREDITO

| <i>CAPITAL \$</i>                | <i>FECHA<br/>INICIO</i> | <i>FECHA<br/>FIN</i> | <i>Interes<br/>Bancario<br/>Corriente</i> | <i>DIAS</i> | <i>Interes<br/>Nominal<br/>Mora</i> | <i>VALOR<br/>INTERESES<br/>\$</i> |
|----------------------------------|-------------------------|----------------------|-------------------------------------------|-------------|-------------------------------------|-----------------------------------|
| 5.958.434                        | 12-oct-21               | 31-oct-21            | 17,08%                                    | 20          | 1,42%                               | 84.610                            |
| 5.958.434                        | 1-nov-21                | 30-nov-21            | 17,27%                                    | 30          | 2,15%                               | 128.106                           |
| 5.958.434                        | 1-dic-21                | 31-dic-21            | 17,46%                                    | 31          | 2,18%                               | 129.894                           |
| 5.958.434                        | 1-ene-22                | 31-ene-22            | 17,66%                                    | 31          | 2,21%                               | 131.681                           |
| 5.958.434                        | 1-feb-22                | 28-feb-22            | 18,30%                                    | 28          | 2,29%                               | 136.448                           |
| 5.958.434                        | 1-mar-22                | 31-mar-22            | 18,47%                                    | 31          | 2,31%                               | 137.640                           |
| <b>TOTAL INTERESES</b>           |                         |                      |                                           |             |                                     | <b>342.610</b>                    |
| <b>INTERESES REMUNERATORIOS</b>  |                         |                      |                                           |             |                                     | <b>1.967.809</b>                  |
| <b>OTROS CONCEPTOS</b>           |                         |                      |                                           |             |                                     | <b>723.047</b>                    |
| <b>CAPITAL</b>                   |                         |                      |                                           |             |                                     | <b>5.958.434</b>                  |
| <b>TOTAL CAPITAL E INTERESES</b> |                         |                      |                                           |             |                                     | <b>8.991.900</b>                  |

SON:

**OCHO MILLONES NOVECIENTOS NOVENTA Y UN MIL NOVECIENTOS PESOS  
M.CTE.**

Solicito se le corra traslado de conformidad con el art. 110 del C. G. P., y si no es objetada, se proceda a su aprobación.

Atentamente,

**JOSE IVAN SOTO ANGARITA**  
CC. 15.481.428 de Cúcuta  
T.P. 84914 C.S.J





## Banco Agrario de Colombia

OBLIGACION: 725051050002475

REFERENCIA: LIQUIDACION DE CREDITO

| CAPITAL \$                | FECHA INICIO | FECHA FIN | Interes Bancario Corriente | DIAS | Interes Nominal Mora | VALOR INTERESES \$ |
|---------------------------|--------------|-----------|----------------------------|------|----------------------|--------------------|
| 8.295.204                 | 28-jul-21    | 31-jul-21 | 17,18%                     | 4    | 0,26%                | 21.938             |
| 8.295.204                 | 1-ago-21     | 31-ago-21 | 17,19%                     | 31   | 2,06%                | 171.129            |
| 8.295.204                 | 1-sep-21     | 30-sep-21 | 17,19%                     | 30   | 2,00%                | 165.572            |
| 8.295.204                 | 1-oct-21     | 31-oct-21 | 17,08%                     | 31   | 1,42%                | 117.792            |
| 8.295.204                 | 1-nov-21     | 30-nov-21 | 17,27%                     | 30   | 2,15%                | 178.347            |
| 8.295.204                 | 1-dic-21     | 31-dic-21 | 17,46%                     | 31   | 2,18%                | 180.835            |
| 8.295.204                 | 1-ene-22     | 31-ene-22 | 17,66%                     | 31   | 2,21%                | 183.324            |
| 8.295.204                 | 1-feb-22     | 28-feb-22 | 18,30%                     | 28   | 2,29%                | 189.960            |
| 8.295.204                 | 1-mar-22     | 31-mar-22 | 18,47%                     | 31   | 2,31%                | 191.619            |
| TOTAL INTERESES           |              |           |                            |      |                      | 835.613            |
| INTERESES REMUNERATORIOS  |              |           |                            |      |                      | 1.435.646          |
| OTROS CONCEPTOS           |              |           |                            |      |                      | 949.038            |
| CAPITAL                   |              |           |                            |      |                      | 8.295.204          |
| TOTAL CAPITAL E INTERESES |              |           |                            |      |                      | 11.515.501         |

SON:

ONCE MILLONES QUINIENTOS QUINCE MIL QUINIENTOS UN PESOS M.CTE.

Solicito se le corra traslado de conformidad con el art. 110 del C. G. P., y si no es objetada, se proceda a su aprobación.

Atentamente,

JOSE IVAN SOTO ANGARITA  
CC. 13.481.428 de Cúcuta  
T.P. 84914 C.S.J





**ABOGADO**  
**DR. JOSÉ IVÁN SOTO ANGARITA.**  
**ESPECIALISTA EN DERECHO EMPRESARIAL Y**  
**ADMINISTRATIVO.**

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San José de Cúcuta, 04 de abril de 2022.

**SEÑORES**

**JUZGADO PROMISCOU MUNICIPAL DE PUERTO SANTANDER.**

**E.**

**S.**

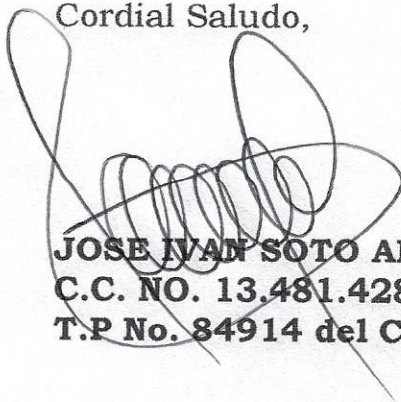
**D.**

|                   |                                       |
|-------------------|---------------------------------------|
| <b>REFERENCIA</b> | <b>EJECUTIVO SINGULAR</b>             |
| <b>DEMANDANTE</b> | <b>BANCO AGRARIO DE COLOMBIA S.A.</b> |
| <b>DEMANDADO</b>  | <b>CAMPO ELIAS MARTINEZ ORTIZ.</b>    |
| <b>RADICADO</b>   | <b>2021-00069.</b>                    |

**JOSE IVAN SOTO ANGARITA**, mayor de edad, domiciliado en Cúcuta, identificado con la cedula No. **13.481.428** Expedida en Cúcuta, Abogado titulado y en ejercicio, con Tarjeta Profesional No. **84914** del Consejo Superior de la Judicatura, En mi condición de apoderado Judicial de **BANCO AGRARIO DE COLOMBIA S.A.**, manifiesto lo siguiente:

De manera atenta y respetuosamente me permito anexar oficio de la actualización de la liquidación de crédito de la **OBLIGACIÓN No. 725051050001425.**

Cordial Saludo,



**JOSE IVAN SOTO ANGARITA.**  
**C.C. NO. 13.481.428 de Cúcuta.**  
**T.P No. 84914 del C.S de la J.**



**Banco Agrario  
de Colombia**

OBLIGACION No. 725051050001425

REFERENCIA: LIQUIDACION DE CREDITO

| CAPITAL \$                | FECHA INICIO | FECHA FIN | Interes Bancario Corriente | DIAS | Interes Nominal Mora | VALOR INTERESES \$ |
|---------------------------|--------------|-----------|----------------------------|------|----------------------|--------------------|
| 24.999.686                | 26-ago-21    | 31-ago-21 | 17,19%                     | 6    | 0,40%                | 99.271             |
| 24.999.686                | 1-sep-21     | 30-sep-21 | 17,19%                     | 30   | 2,00%                | 498.992            |
| 24.999.686                | 1-oct-21     | 31-oct-21 | 17,08%                     | 31   | 1,42%                | 354.996            |
| 24.999.686                | 1-nov-21     | 30-nov-21 | 17,27%                     | 30   | 2,15%                | 537.493            |
| 24.999.686                | 1-dic-21     | 31-dic-21 | 17,46%                     | 31   | 2,18%                | 544.993            |
| 24.999.686                | 1-ene-22     | 31-ene-22 | 17,66%                     | 31   | 2,21%                | 552.493            |
| 24.999.686                | 1-feb-22     | 28-feb-22 | 18,30%                     | 28   | 2,29%                | 572.493            |
| 24.999.686                | 1-mar-22     | 31-mar-22 | 18,47%                     | 31   | 2,31%                | 577.493            |
| TOTAL INTERESES           |              |           |                            |      |                      | 2.035.745          |
| INTERESES REMUNERATORIOS  |              |           |                            |      |                      | 2.506.374          |
| OTROS CONCEPTOS           |              |           |                            |      |                      | 2.609.799          |
| CAPITAL                   |              |           |                            |      |                      | 24.999.686         |
| TOTAL CAPITAL E INTERESES |              |           |                            |      |                      | 32.151.604         |

SON:

TREINTA Y DOS MILLONES CIENTO CINCUENTA Y UN MIL SEISCIENTOS CUATRO PESOS M.CTE.

Solicito se le corra traslado de conformidad con el art. 110 del C. G. P., y si no es objetada, se proceda a su aprobación.

Atentamente,

JOSE IVAN SOTO ANGARITA  
CC. 13.481.428 de Cúcuta  
T.P. 84914 C.S.J





**ABOGADO**  
**DR. JOSÉ IVÁN SOTO ANGARITA.**  
**ESPECIALISTA EN DERECHO EMPRESARIAL Y**  
**ADMINISTRATIVO.**

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San José de Cúcuta, 04 de abril de 2022.

**SEÑORES**

**JUZGADO PROMISCOU MUNICIPAL DE PUERTO SANTANDER.**

**E.**

**S.**

**D.**

|                   |                                       |
|-------------------|---------------------------------------|
| <b>REFERENCIA</b> | <b>EJECUTIVO SINGULAR</b>             |
| <b>DEMANDANTE</b> | <b>BANCO AGRARIO DE COLOMBIA S.A.</b> |
| <b>DEMANDADO</b>  | <b>MELKEZIDEL SANCHEZ CALA.</b>       |
| <b>RADICADO</b>   | <b>2021-00060.</b>                    |

**JOSE IVAN SOTO ANGARITA**, mayor de edad, domiciliado en Cúcuta, identificado con la cedula No. **13.481.428** Expedida en Cúcuta, Abogado titulado y en ejercicio, con Tarjeta Profesional No. **84914** del Consejo Superior de la Judicatura, En mi condición de apoderado Judicial de **BANCO AGRARIO DE COLOMBIA S.A.**, manifiesto lo siguiente:

De manera atenta y respetuosamente me permito anexar oficio de la actualización de la liquidación de crédito de la **OBLIGACIÓN No. 725051010335530.**

Cordial Saludo,

**JOSE IVAN SOTO ANGARITA.**  
**C.C. NO. 13.481.428 de Cúcuta.**  
**T.P No. 84914 del C.S de la J.**





## Banco Agrario de Colombia

OBLIGACION: 725051010335530

REFERENCIA: LIQUIDACION DE CREDITO

| CAPITAL \$                | FECHA INICIO | FECHA FIN | Interes Bancario Corriente | DIAS | Interes Nominal Mora | VALOR INTERESES \$ |
|---------------------------|--------------|-----------|----------------------------|------|----------------------|--------------------|
| 15.722.122                | 27-jul-21    | 31-jul-21 | 17,18%                     | 5    | 0,33%                | 51.986             |
| 15.722.122                | 1-ago-21     | 31-ago-21 | 17,19%                     | 31   | 2,06%                | 324.344            |
| 15.722.122                | 1-sep-21     | 30-sep-21 | 17,19%                     | 30   | 2,00%                | 313.812            |
| 15.722.122                | 1-oct-21     | 31-oct-21 | 17,08%                     | 31   | 1,42%                | 223.254            |
| 15.722.122                | 1-nov-21     | 30-nov-21 | 17,27%                     | 30   | 2,15%                | 338.026            |
| 15.722.122                | 1-dic-21     | 31-dic-21 | 17,46%                     | 31   | 2,18%                | 342.742            |
| 15.722.122                | 1-ene-22     | 31-ene-22 | 17,66%                     | 31   | 2,21%                | 347.459            |
| 15.722.122                | 1-feb-22     | 28-feb-22 | 18,30%                     | 28   | 2,29%                | 360.037            |
| 15.722.122                | 1-mar-22     | 31-mar-22 | 18,47%                     | 31   | 2,31%                | 363.181            |
| TOTAL INTERESES           |              |           |                            |      |                      | 1.594.165          |
| INTERESES REMUNERATORIOS  |              |           |                            |      |                      | 3.664.854          |
| OTROS CONCEPTOS           |              |           |                            |      |                      | 105.156            |
| CAPITAL                   |              |           |                            |      |                      | 15.722.122         |
| TOTAL CAPITAL E INTERESES |              |           |                            |      |                      | 21.086.297         |

SON:

VEINTIUN MILLON OCHENTA Y SEIS MIL DOCIENTOS NOVENTA Y SIETE PESOS M.CTE.

Solicito se le corra traslado de conformidad con el art. 110 del C. G. P., y si no es objetada, se proceda a su aprobación.

Atentamente,

JOSE IVAN SOTO ANGARITA  
CC. 13.481.428 de Cúcuta  
T.P. 84914 C.S.J





**ABOGADO**  
**DR. JOSÉ IVÁN SOTO ANGARITA.**  
**ESPECIALISTA EN DERECHO EMPRESARIAL Y**  
**ADMINISTRATIVO.**

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San José de Cúcuta, 18 de abril de 2022.

**SEÑORES**

**JUZGADO PROMISCO MUICIPAL DE PUERTO SANTANDER.**

**E.**

**S.**

**D.**

|                   |                                          |
|-------------------|------------------------------------------|
| <b>REFERENCIA</b> | <b>EJECUTIVO SINGULAR</b>                |
| <b>DEMANDANTE</b> | <b>BANCO AGRARIO DE COLOMBIA S.A.</b>    |
| <b>DEMANDADO</b>  | <b>KINDERMAN GARY REGUILLO MANJARRES</b> |
| <b>RADICADO</b>   | <b>2015-00066</b>                        |

**JOSE IVAN SOTO ANGARITA**, mayor de edad, domiciliado en Cúcuta, identificado con la cedula No. **13.481.428** Expedida en Cúcuta, Abogado titulado y en ejercicio, con Tarjeta Profesional No. **84914** del Consejo Superior de la Judicatura, En mi condición de apoderado Judicial de **BANCO AGRARIO DE COLOMBIA S.A.**, manifiesto lo siguiente:

De manera atenta y respetuosamente me permito anexar oficio de la actualización de la liquidación de crédito de la **OBLIGACIÓN No. 725051010214585.**

Cordial Saludo.

**JOSE IVAN SOTO ANGARITA.**  
**C.C. NO. 13.481.428 de Cúcuta.**  
**T.P No. 84914 del C.S de la J.**



# Banco Agrario de Colombia

OBLIGACION: No. 725051010214585

REFERENCIA: LIQUIDACION DE CREDITO

| CAPITAL \$                                | FECHA INICIO | FECHA FIN | DÍAS | Interés<br>Moratorio | VALOR<br>INTERESES<br>\$ |
|-------------------------------------------|--------------|-----------|------|----------------------|--------------------------|
| \$ 9.166.620                              | 1-oct-20     | 31-oct-20 | 31   | 2,16%                | 197.999                  |
| \$ 9.166.620                              | 1-nov-20     | 30-nov-20 | 30   | 2,07%                | 189.749                  |
| \$ 9.166.620                              | 1-dic-20     | 31-dic-20 | 31   | 2,09%                | 191.582                  |
| \$ 9.166.620                              | 1-ene-21     | 31-ene-21 | 31   | 2,08%                | 190.666                  |
| \$ 9.166.620                              | 1-feb-21     | 28-feb-21 | 28   | 1,90%                | 174.166                  |
| \$ 9.166.620                              | 1-mar-21     | 31-mar-21 | 31   | 2,09%                | 191.582                  |
| \$ 9.166.620                              | 1-abr-21     | 30-abr-21 | 30   | 2,01%                | 184.249                  |
| \$ 9.166.620                              | 1-may-21     | 31-may-21 | 31   | 2,07%                | 189.749                  |
| \$ 9.166.620                              | 1-jun-21     | 30-jun-21 | 30   | 2,00%                | 183.332                  |
| \$ 9.166.620                              | 1-jul-21     | 31-jul-21 | 31   | 2,06%                | 188.832                  |
| \$ 9.166.620                              | 1-ago-21     | 31-ago-21 | 31   | 2,15%                | 197.082                  |
| \$ 9.166.620                              | 1-sep-21     | 30-sep-21 | 30   | 2,14%                | 196.166                  |
| \$ 9.166.620                              | 1-oct-21     | 31-oct-21 | 31   | 1,42%                | 130.166                  |
| \$ 9.166.620                              | 1-nov-21     | 30-nov-21 | 30   | 2,15%                | 197.082                  |
| \$ 9.166.620                              | 1-dic-21     | 31-dic-21 | 31   | 2,18%                | 199.832                  |
| \$ 9.166.620                              | 1-ene-22     | 31-ene-22 | 31   | 2,20%                | 201.666                  |
| \$ 9.166.620                              | 1-feb-22     | 28-feb-22 | 28   | 2,26%                | 207.166                  |
| \$ 9.166.620                              | 1-mar-22     | 31-mar-22 | 31   | 2,31%                | 211.749                  |
| TOTAL LIQUIDACIÓN DE INTERESES MORATORIOS |              |           |      |                      | \$ 3.422.816             |
| ANTERIOR LIQUIDACIÓN EN FIRME             |              |           |      |                      | \$ 23.841.915            |
| TOTAL                                     |              |           |      |                      | \$ 27.264.731            |

TOTAL DE LA OBLIGACIÓN ACTUALIZADA A FECHA 31 DE MARZO DE 2022, SIN INCLUIR LAS COSTAS, SON:

VEINTISIETE MILLONES DOSCIENTOS SESENTA Y CUATRO MIL SETECIENTOS TREINTA Y UN PESOS M/CTE.

Atentamente,

JOSE IVAN SOTO ANGARITA  
CC. 13.481.428 de Cúcuta  
T.P. 84914 C.S.J.