

**RAD: 2021-0034 BANCO AGRARIO DE COLOMBIA S.A. VS RAFAEL ANTONIO PINTO**

ASESORIAS JURIDICAS PROFESIONALES DIANA VANNESSA PEREZ GUTIERREZ  
<profesionaljuridica@outlook.com>

Mié 15/02/2023 12:01

Para: Juzgado 01 Promiscuo Municipal - Santander - Encino <j01prmpalencino@cendoj.ramajudicial.gov.co>; DIANA VANNESSA PEREZ <profesionaljuridicabga@gmail.com>

 1 archivos adjuntos (770 KB)  
LC RAFAEL PINTO.pdf;

Buena Tarde Sr. Juez, en mi calidad de Apoderada Judicial del Banco Agrario allego memorial dentro del expediente de la referencia para lo pertinente. Gracias.

Diana Vannessa Pérez Gutiérrez  
Abogada



Asesorías Jurídicas Profesionales S.A.S.  
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Señor  
JUEZ PROMISCO MUNICIPAL DE ENCINO (SDER).  
E. S. D.

REF. PROCESO EJECUTIVO SINGULAR.  
DTE: BANCO AGRARIO DE COLOMBIA S.A.  
DDO: RAFAEL ANTONIO PINTO  
ASUNTO: LIQUIDACION DEL CREDITO.  
RAD. 2021-0034

DIANA VANNESSA PÉREZ GUTIÉRREZ, mayor de edad, domiciliada en Bucaramanga, identificada con la Cédula de Ciudadanía N° 63.548.105 expedida en Bucaramanga, Abogada en Ejercicio, portadora de la Tarjeta Profesional N° 178.736 expedida por el Consejo Superior de la Judicatura, obrando como Apoderada Judicial de la entidad demandante solicito de forma respetuosa allego al Despacho, liquidación del crédito solicitada por el despacho.

## LIQUIDACION DEL CREDITO PAGARE N° 015046100013149

| CAPITAL      | FECHA DE INICIO | FECHA DE TERMINACION | No. DIAS | INTERESES ANUAL | % MORA ANUAL | % EFECTIVO NOMINAL | % MORA MENSUAL | INTERES MORA DIARIO | TOTAL      |
|--------------|-----------------|----------------------|----------|-----------------|--------------|--------------------|----------------|---------------------|------------|
| \$ 4.998.730 | 22/11/2020      | 30/11/2020           | 9        | 17,84%          | 26,76%       | 23,95%             | 2,00%          | 0,0665233%          | \$ 29.928  |
| \$ 4.998.730 | 1/12/2020       | 31/12/2020           | 31       | 17,46%          | 26,19%       | 23,49%             | 1,96%          | 0,0652466%          | \$ 101.107 |
| \$ 4.998.730 | 1/01/2021       | 31/01/2021           | 31       | 17,32%          | 25,98%       | 23,32%             | 1,94%          | 0,0647749%          | \$ 100.376 |
| \$ 4.998.730 | 1/02/2021       | 28/02/2021           | 28       | 17,54%          | 26,31%       | 23,59%             | 1,97%          | 0,0655158%          | \$ 91.699  |
| \$ 4.998.730 | 1/03/2021       | 31/03/2021           | 31       | 17,41%          | 26,12%       | 23,43%             | 1,95%          | 0,0650782%          | \$ 100.846 |
| \$ 4.998.730 | 1/04/2021       | 30/04/2021           | 30       | 17,31%          | 25,97%       | 23,31%             | 1,94%          | 0,0647412%          | \$ 97.087  |
| \$ 4.998.730 | 1/05/2021       | 31/05/2021           | 31       | 17,22%          | 25,83%       | 23,20%             | 1,93%          | 0,0644376%          | \$ 99.853  |
| \$ 4.998.730 | 1/06/2021       | 30/06/2021           | 30       | 17,21%          | 25,82%       | 23,19%             | 1,93%          | 0,0644038%          | \$ 96.581  |
| \$ 4.998.730 | 1/07/2021       | 31/07/2021           | 31       | 17,18%          | 25,77%       | 23,15%             | 1,93%          | 0,0643025%          | \$ 99.644  |
| \$ 4.998.730 | 1/08/2021       | 31/08/2021           | 31       | 17,24%          | 25,86%       | 23,22%             | 1,94%          | 0,0645051%          | \$ 99.957  |
| \$ 4.998.730 | 1/09/2021       | 30/09/2021           | 30       | 17,19%          | 25,79%       | 23,16%             | 1,93%          | 0,0643363%          | \$ 96.480  |
| \$ 4.998.730 | 1/10/2021       | 31/10/2021           | 31       | 17,08%          | 25,62%       | 23,03%             | 1,92%          | 0,0639647%          | \$ 99.120  |
| \$ 4.998.730 | 1/11/2021       | 30/11/2021           | 30       | 17,27%          | 25,91%       | 23,26%             | 1,94%          | 0,0646063%          | \$ 96.885  |
| \$ 4.998.730 | 1/12/2021       | 31/12/2021           | 31       | 17,46%          | 26,19%       | 23,49%             | 1,96%          | 0,0652466%          | \$ 101.107 |
| \$ 4.998.730 | 1/01/2022       | 31/01/2022           | 31       | 17,66%          | 26,49%       | 23,73%             | 1,98%          | 0,0659192%          | \$ 102.149 |
| \$ 4.998.730 | 1/02/2022       | 28/02/2022           | 28       | 18,30%          | 27,45%       | 24,50%             | 2,04%          | 0,0680616%          | \$ 95.262  |
| \$ 4.998.730 | 1/03/2022       | 31/03/2022           | 31       | 18,47%          | 27,71%       | 24,71%             | 2,06%          | 0,0686282%          | \$ 106.347 |
| \$ 4.998.730 | 1/04/2022       | 30/04/2022           | 30       | 19,05%          | 28,58%       | 25,40%             | 2,12%          | 0,0705536%          | \$ 105.803 |
| \$ 4.998.730 | 1/05/2022       | 31/05/2022           | 31       | 20,40%          | 30,60%       | 27,00%             | 2,25%          | 0,0749891%          | \$ 116.204 |

|                                                               |           |            |    |        |        |        |       |                    |                    |
|---------------------------------------------------------------|-----------|------------|----|--------|--------|--------|-------|--------------------|--------------------|
| \$ 4.998.730                                                  | 1/06/2022 | 30/06/2022 | 30 | 20,40% | 30,60% | 27,00% | 2,25% | 0,0749891%         | \$ 112.455         |
| \$ 4.998.730                                                  | 1/07/2022 | 31/07/2022 | 31 | 21,28% | 31,92% | 28,02% | 2,34% | 0,0778466%         | \$ 120.632         |
| \$ 4.998.730                                                  | 1/08/2022 | 31/08/2022 | 31 | 22,21% | 33,32% | 29,10% | 2,43% | 0,0808381%         | \$ 125.267         |
| \$ 4.998.730                                                  | 1/09/2022 | 30/09/2022 | 30 | 23,50% | 35,25% | 30,58% | 2,55% | 0,0849405%         | \$ 127.378         |
| \$ 4.998.730                                                  | 1/10/2022 | 21/10/2022 | 21 | 24,61% | 36,92% | 31,83% | 2,65% | 0,0884276%         | \$ 92.825          |
| \$ 4.998.730                                                  | 1/11/2022 | 30/11/2022 | 30 | 25,78% | 38,67% | 33,14% | 2,76% | 0,0920614%         | \$ 138.057         |
| \$ 4.998.730                                                  | 1/12/2022 | 31/12/2022 | 31 | 27,64% | 41,46% | 35,19% | 2,93% | 0,0977522%         | \$ 151.477         |
| \$ 4.998.730                                                  | 1/01/2023 | 31/01/2023 | 31 | 28,84% | 43,26% | 36,49% | 3,04% | 0,1013694%         | \$ 157.083         |
| \$ 4.998.730                                                  | 1/02/2023 | 15/02/2023 | 15 | 30,18% | 45,27% | 37,93% | 3,16% | 0,1053597%         | \$ 79.000          |
|                                                               |           |            |    |        |        |        |       |                    | <b>\$2.940.608</b> |
| VALOR INTERESES MORATORIOS HASTA FEBRERO 15 DE 2023           |           |            |    |        |        |        |       | \$2.940.608        |                    |
| VALOR CAPITAL                                                 |           |            |    |        |        |        |       | <b>\$4.998.730</b> |                    |
| INTERESES REMUNERATORIOS                                      |           |            |    |        |        |        |       | <b>\$532.786</b>   |                    |
| OTROS CONCEPTOS                                               |           |            |    |        |        |        |       | <b>\$113.982</b>   |                    |
| <b>VALOR TOTAL DE LA LIQUIDACION HASTA FEBRERO 15 DE 2023</b> |           |            |    |        |        |        |       | <b>\$8.586.106</b> |                    |

**LIQUIDACION DEL CREDITO PAGARE N° 4481860003782759**

| CAPITAL      | FECHA DE INICIO | FECHA DE TERMINACION | No. DIAS | INTERESES ANUAL | % MORA ANUAL | % EFECTIVO NOMINAL | % MORA MENSUAL | INTERES MORA DIARIO | TOTAL      |
|--------------|-----------------|----------------------|----------|-----------------|--------------|--------------------|----------------|---------------------|------------|
| \$ 4.652.206 | 24/11/2020      | 30/11/2020           | 7        | 17,84%          | 26,76%       | 23,95%             | 2,00%          | 0,0665233%          | \$ 21.664  |
| \$ 4.652.206 | 1/12/2020       | 31/12/2020           | 31       | 17,46%          | 26,19%       | 23,49%             | 1,96%          | 0,0652466%          | \$ 94.098  |
| \$ 4.652.206 | 1/01/2021       | 31/01/2021           | 31       | 17,32%          | 25,98%       | 23,32%             | 1,94%          | 0,0647749%          | \$ 93.417  |
| \$ 4.652.206 | 1/02/2021       | 28/02/2021           | 28       | 17,54%          | 26,31%       | 23,59%             | 1,97%          | 0,0655158%          | \$ 85.342  |
| \$ 4.652.206 | 1/03/2021       | 31/03/2021           | 31       | 17,41%          | 26,12%       | 23,43%             | 1,95%          | 0,0650782%          | \$ 93.855  |
| \$ 4.652.206 | 1/04/2021       | 30/04/2021           | 30       | 17,31%          | 25,97%       | 23,31%             | 1,94%          | 0,0647412%          | \$ 90.357  |
| \$ 4.652.206 | 1/05/2021       | 31/05/2021           | 31       | 17,22%          | 25,83%       | 23,20%             | 1,93%          | 0,0644376%          | \$ 92.931  |
| \$ 4.652.206 | 1/06/2021       | 30/06/2021           | 30       | 17,21%          | 25,82%       | 23,19%             | 1,93%          | 0,0644038%          | \$ 89.886  |
| \$ 4.652.206 | 1/07/2021       | 31/07/2021           | 31       | 17,18%          | 25,77%       | 23,15%             | 1,93%          | 0,0643025%          | \$ 92.736  |
| \$ 4.652.206 | 1/08/2021       | 31/08/2021           | 31       | 17,24%          | 25,86%       | 23,22%             | 1,94%          | 0,0645051%          | \$ 93.028  |
| \$ 4.652.206 | 1/09/2021       | 30/09/2021           | 30       | 17,19%          | 25,79%       | 23,16%             | 1,93%          | 0,0643363%          | \$ 89.792  |
| \$ 4.652.206 | 1/10/2021       | 31/10/2021           | 31       | 17,08%          | 25,62%       | 23,03%             | 1,92%          | 0,0639647%          | \$ 92.249  |
| \$ 4.652.206 | 1/11/2021       | 30/11/2021           | 30       | 17,27%          | 25,91%       | 23,26%             | 1,94%          | 0,0646063%          | \$ 90.169  |
| \$ 4.652.206 | 1/12/2021       | 31/12/2021           | 31       | 17,46%          | 26,19%       | 23,49%             | 1,96%          | 0,0652466%          | \$ 94.098  |
| \$ 4.652.206 | 1/01/2022       | 31/01/2022           | 31       | 17,66%          | 26,49%       | 23,73%             | 1,98%          | 0,0659192%          | \$ 95.068  |
| \$ 4.652.206 | 1/02/2022       | 28/02/2022           | 28       | 18,30%          | 27,45%       | 24,50%             | 2,04%          | 0,0680616%          | \$ 88.658  |
| \$ 4.652.206 | 1/03/2022       | 31/03/2022           | 31       | 18,47%          | 27,71%       | 24,71%             | 2,06%          | 0,0686282%          | \$ 98.975  |
| \$ 4.652.206 | 1/04/2022       | 30/04/2022           | 30       | 19,05%          | 28,58%       | 25,40%             | 2,12%          | 0,0705536%          | \$ 98.469  |
| \$ 4.652.206 | 1/05/2022       | 31/05/2022           | 31       | 20,40%          | 30,60%       | 27,00%             | 2,25%          | 0,0749891%          | \$ 108.148 |
| \$ 4.652.206 | 1/06/2022       | 30/06/2022           | 30       | 20,40%          | 30,60%       | 27,00%             | 2,25%          | 0,0749891%          | \$ 104.659 |
| \$ 4.652.206 | 1/07/2022       | 31/07/2022           | 31       | 21,28%          | 31,92%       | 28,02%             | 2,34%          | 0,0778466%          | \$ 112.269 |
| \$ 4.652.206 | 1/08/2022       | 31/08/2022           | 31       | 22,21%          | 33,32%       | 29,10%             | 2,43%          | 0,0808381%          | \$ 116.583 |
| \$ 4.652.206 | 1/09/2022       | 30/09/2022           | 30       | 23,50%          | 35,25%       | 30,58%             | 2,55%          | 0,0849405%          | \$ 118.548 |
| \$ 4.652.206 | 1/10/2022       | 21/10/2022           | 21       | 24,61%          | 36,92%       | 31,83%             | 2,65%          | 0,0884276%          | \$ 86.391  |
| \$ 4.652.206 | 1/11/2022       | 30/11/2022           | 30       | 25,78%          | 38,67%       | 33,14%             | 2,76%          | 0,0920614%          | \$ 128.487 |

|                                                               |           |            |    |        |        |        |       |                    |                    |
|---------------------------------------------------------------|-----------|------------|----|--------|--------|--------|-------|--------------------|--------------------|
| \$ 4.652.206                                                  | 1/12/2022 | 31/12/2022 | 31 | 27,64% | 41,46% | 35,19% | 2,93% | 0,0977522%         | \$ 140.977         |
| \$ 4.652.206                                                  | 1/01/2023 | 31/01/2023 | 31 | 28,84% | 43,26% | 36,49% | 3,04% | 0,1013694%         | \$ 146.193         |
| \$ 4.652.206                                                  | 1/02/2023 | 15/02/2023 | 15 | 30,18% | 45,27% | 37,93% | 3,16% | 0,1053597%         | \$ 73.523          |
|                                                               |           |            |    |        |        |        |       |                    | <b>\$2.730.568</b> |
| VALOR INTERESES MORATORIOS HASTA FEBRERO 15 DE 2023           |           |            |    |        |        |        |       | \$2.730.568        |                    |
| VALOR CAPITAL                                                 |           |            |    |        |        |        |       | <b>\$4.652.206</b> |                    |
| INTERESES REMUNERATORIOS                                      |           |            |    |        |        |        |       | <b>\$172.341</b>   |                    |
| OTROS CONCEPTOS                                               |           |            |    |        |        |        |       | <b>\$90.064</b>    |                    |
| <b>VALOR TOTAL DE LA LIQUIDACION HASTA FEBRERO 15 DE 2023</b> |           |            |    |        |        |        |       | <b>\$7.645.179</b> |                    |

**LIQUIDACION DEL CREDITO PAGARE N° 015046100015174**

| CAPITAL                                             | FECHA DE INICIO | FECHA DE TERMINACION | No. DIAS | INTERESES ANUAL | % MORA ANUAL | % EFECTIVO NOMINAL | % MORA MENSUAL | INTERES MORA DIARIO | TOTAL              |
|-----------------------------------------------------|-----------------|----------------------|----------|-----------------|--------------|--------------------|----------------|---------------------|--------------------|
| \$ 2.677.500                                        | 22/11/2020      | 30/11/2020           | 9        | 17,84%          | 26,76%       | 23,95%             | 2,00%          | 0,0665233%          | \$ 16.030          |
| \$ 2.677.500                                        | 1/12/2020       | 31/12/2020           | 31       | 17,46%          | 26,19%       | 23,49%             | 1,96%          | 0,0652466%          | \$ 54.156          |
| \$ 2.677.500                                        | 1/01/2021       | 31/01/2021           | 31       | 17,32%          | 25,98%       | 23,32%             | 1,94%          | 0,0647749%          | \$ 53.765          |
| \$ 2.677.500                                        | 1/02/2021       | 28/02/2021           | 28       | 17,54%          | 26,31%       | 23,59%             | 1,97%          | 0,0655158%          | \$ 49.117          |
| \$ 2.677.500                                        | 1/03/2021       | 31/03/2021           | 31       | 17,41%          | 26,12%       | 23,43%             | 1,95%          | 0,0650782%          | \$ 54.017          |
| \$ 2.677.500                                        | 1/04/2021       | 30/04/2021           | 30       | 17,31%          | 25,97%       | 23,31%             | 1,94%          | 0,0647412%          | \$ 52.003          |
| \$ 2.677.500                                        | 1/05/2021       | 31/05/2021           | 31       | 17,22%          | 25,83%       | 23,20%             | 1,93%          | 0,0644376%          | \$ 53.485          |
| \$ 2.677.500                                        | 1/06/2021       | 30/06/2021           | 30       | 17,21%          | 25,82%       | 23,19%             | 1,93%          | 0,0644038%          | \$ 51.732          |
| \$ 2.677.500                                        | 1/07/2021       | 31/07/2021           | 31       | 17,18%          | 25,77%       | 23,15%             | 1,93%          | 0,0643025%          | \$ 53.373          |
| \$ 2.677.500                                        | 1/08/2021       | 31/08/2021           | 31       | 17,24%          | 25,86%       | 23,22%             | 1,94%          | 0,0645051%          | \$ 53.541          |
| \$ 2.677.500                                        | 1/09/2021       | 30/09/2021           | 30       | 17,19%          | 25,79%       | 23,16%             | 1,93%          | 0,0643363%          | \$ 51.678          |
| \$ 2.677.500                                        | 1/10/2021       | 31/10/2021           | 31       | 17,08%          | 25,62%       | 23,03%             | 1,92%          | 0,0639647%          | \$ 53.092          |
| \$ 2.677.500                                        | 1/11/2021       | 30/11/2021           | 30       | 17,27%          | 25,91%       | 23,26%             | 1,94%          | 0,0646063%          | \$ 51.895          |
| \$ 2.677.500                                        | 1/12/2021       | 31/12/2021           | 31       | 17,46%          | 26,19%       | 23,49%             | 1,96%          | 0,0652466%          | \$ 54.156          |
| \$ 2.677.500                                        | 1/01/2022       | 31/01/2022           | 31       | 17,66%          | 26,49%       | 23,73%             | 1,98%          | 0,0659192%          | \$ 54.715          |
| \$ 2.677.500                                        | 1/02/2022       | 28/02/2022           | 28       | 18,30%          | 27,45%       | 24,50%             | 2,04%          | 0,0680616%          | \$ 51.026          |
| \$ 2.677.500                                        | 1/03/2022       | 31/03/2022           | 31       | 18,47%          | 27,71%       | 24,71%             | 2,06%          | 0,0686282%          | \$ 56.963          |
| \$ 2.677.500                                        | 1/04/2022       | 30/04/2022           | 30       | 19,05%          | 28,58%       | 25,40%             | 2,12%          | 0,0705536%          | \$ 56.672          |
| \$ 2.677.500                                        | 1/05/2022       | 31/05/2022           | 31       | 20,40%          | 30,60%       | 27,00%             | 2,25%          | 0,0749891%          | \$ 62.243          |
| \$ 2.677.500                                        | 1/06/2022       | 30/06/2022           | 30       | 20,40%          | 30,60%       | 27,00%             | 2,25%          | 0,0749891%          | \$ 60.235          |
| \$ 2.677.500                                        | 1/07/2022       | 31/07/2022           | 31       | 21,28%          | 31,92%       | 28,02%             | 2,34%          | 0,0778466%          | \$ 64.615          |
| \$ 2.677.500                                        | 1/08/2022       | 31/08/2022           | 31       | 22,21%          | 33,32%       | 29,10%             | 2,43%          | 0,0808381%          | \$ 67.098          |
| \$ 2.677.500                                        | 1/09/2022       | 30/09/2022           | 30       | 23,50%          | 35,25%       | 30,58%             | 2,55%          | 0,0849405%          | \$ 68.228          |
| \$ 2.677.500                                        | 1/10/2022       | 21/10/2022           | 21       | 24,61%          | 36,92%       | 31,83%             | 2,65%          | 0,0884276%          | \$ 49.721          |
| \$ 2.677.500                                        | 1/11/2022       | 30/11/2022           | 30       | 25,78%          | 38,67%       | 33,14%             | 2,76%          | 0,0920614%          | \$ 73.948          |
| \$ 2.677.500                                        | 1/12/2022       | 31/12/2022           | 31       | 27,64%          | 41,46%       | 35,19%             | 2,93%          | 0,0977522%          | \$ 81.137          |
| \$ 2.677.500                                        | 1/01/2023       | 31/01/2023           | 31       | 28,84%          | 43,26%       | 36,49%             | 3,04%          | 0,1013694%          | \$ 84.139          |
| \$ 2.677.500                                        | 1/02/2023       | 15/02/2023           | 15       | 30,18%          | 45,27%       | 37,93%             | 3,16%          | 0,1053597%          | \$ 42.315          |
|                                                     |                 |                      |          |                 |              |                    |                |                     | <b>\$1.575.096</b> |
| VALOR INTERESES MORATORIOS HASTA FEBRERO 15 DE 2023 |                 |                      |          |                 |              |                    |                | \$1.575.096         |                    |
| VALOR CAPITAL                                       |                 |                      |          |                 |              |                    |                | <b>\$2.677.500</b>  |                    |

|                                                               |                    |
|---------------------------------------------------------------|--------------------|
| INTERESES REMUNERATORIOS                                      | \$172.341          |
| OTROS CONCEPTOS                                               | \$90.064           |
| <b>VALOR TOTAL DE LA LIQUIDACION HASTA FEBRERO 15 DE 2023</b> | <b>\$4.515.001</b> |

|                                                          |                     |
|----------------------------------------------------------|---------------------|
| VALOR TOTAL DE LA LIQUIDACION PAGARE N° 015046100013149  | \$8.586.106         |
| VALOR TOTAL DE LA LIQUIDACION PAGARE N° 4481860003782759 | \$7.645.179         |
| VALOR TOTAL DE LA LIQUIDACION PAGARE N° 015046100015174  | \$4.515.001         |
| AGENCIAS EN DERECHO                                      | \$1.055.000         |
| <b>VALOR TOTAL DE LA LIQUIDACION</b>                     | <b>\$21.801.286</b> |

Atendí al llamado,



**DIANA VANNESSA PÉREZ GUTIÉRREZ**  
T.P. N° 178.736 del C.S. de la J.