

GUSTAVO DÍAZ OTERO  
Abogado



Señor:  
**JUEZ PROMISCUO MUNICIPAL**  
Lebrija

**REF: PROCESO EJECUTIVO DE COOMULDESA LTDA CONTRA ANGIE VANESSA SUAREZ BAUTISTA. RAD. No. 2017-00221.**

**GUSTAVO DIAZ OTERO**, mayor de esta vecindad, abogado en ejercicio de la profesión, portador de la T.P, 33.229 del C.S. de la J. identificado con cedula de ciudadanía número 5.795.162 expedida en Zapatoca, con correo electrónico inscrito ante el registro Nacional de Abogados [gustavodiazotero@gmail.com](mailto:gustavodiazotero@gmail.com), obrando en calidad de apoderado de la parte demandante dentro del proceso citado en la referencia, por medio del presente escrito, en forma atenta solicito lo siguiente:

Ruego se sirva aprobar la siguiente reliquidación de crédito:

|                                                                                              |                         |
|----------------------------------------------------------------------------------------------|-------------------------|
| Liquidación Anterior                                                                         | \$98.247.036.00         |
| Intereses Moratorios con sus respectivas variaciones<br>Desde el 01-09-2021 hasta 25-07-2023 | \$32.379.969.00         |
| <b>TOTAL LIQUIDACION</b>                                                                     | <b>\$130.627.005.00</b> |

Ruego se sirva correr el correspondiente traslado.

Anexo la liquidación con sus respectivas variaciones.

Del Señor Juez atentamente,

  
**GUSTAVO DIAZ OTERO**  
T.P. No. 33.229 del C.S.J.  
C.C. No. 5.795.162 de Zapatoca



| INTERESES DE MORA                  |                 |                      |          |               |                      |                       |                 |               |
|------------------------------------|-----------------|----------------------|----------|---------------|----------------------|-----------------------|-----------------|---------------|
| CAPITAL                            | FECHA DE INICIO | FECHA DE TERMINACION | No. DIAS | INTERES ANUAL | INTERES AE MORATORIO | INTERES ANUAL NOMINAL | INTERES MENSUAL | TOTAL         |
| \$ 56.389.509,00                   | 1-sep-21        | 30-sep-21            | 30       | 17,19%        | 25,79%               | 22,84%                | 1,90%           | \$1.073.318   |
| \$ 56.389.509,00                   | 1-oct-21        | 31-oct-21            | 31       | 17,08%        | 25,62%               | 22,71%                | 1,89%           | \$1.102.689   |
| \$ 56.389.509,00                   | 1-nov-21        | 30-nov-21            | 30       | 17,27%        | 25,91%               | 22,94%                | 1,91%           | \$1.077.821   |
| \$ 56.389.509,00                   | 1-dic-21        | 31-dic-21            | 31       | 17,46%        | 26,19%               | 23,16%                | 1,93%           | \$1.124.786   |
| \$ 56.389.509,00                   | 1-ene-22        | 31-ene-22            | 31       | 17,66%        | 26,49%               | 23,40%                | 1,95%           | \$1.136.379   |
| \$ 56.389.509,00                   | 1-feb-22        | 28-feb-22            | 28       | 18,30%        | 27,45%               | 24,16%                | 2,01%           | \$1.059.761   |
| \$ 56.389.509,00                   | 1-mar-22        | 31-mar-22            | 31       | 18,47%        | 27,71%               | 24,36%                | 2,03%           | \$1.183.073   |
| \$ 56.389.509,00                   | 1-abr-22        | 30-abr-22            | 30       | 19,05%        | 28,58%               | 25,05%                | 2,09%           | \$1.177.025   |
| \$ 56.389.509,00                   | 1-may-22        | 31-may-22            | 31       | 19,71%        | 29,57%               | 25,82%                | 2,15%           | \$1.253.773   |
| \$ 56.389.509,00                   | 1-jun-22        | 30-jun-22            | 30       | 20,40%        | 30,60%               | 26,62%                | 2,22%           | \$1.251.011   |
| \$ 56.389.509,00                   | 1-jul-22        | 31-jul-22            | 31       | 21,28%        | 31,92%               | 27,64%                | 2,30%           | \$1.341.963   |
| \$ 56.389.509,00                   | 1-ago-22        | 31-ago-22            | 31       | 22,21%        | 33,32%               | 28,70%                | 2,39%           | \$1.393.524   |
| \$ 56.389.509,00                   | 1-sep-22        | 30-sep-22            | 30       | 23,50%        | 35,25%               | 30,15%                | 2,51%           | \$1.416.997   |
| \$ 56.389.509,00                   | 1-oct-22        | 31-oct-22            | 31       | 24,61%        | 36,92%               | 31,39%                | 2,62%           | \$1.524.331   |
| \$ 56.389.509,00                   | 1-nov-22        | 30-nov-22            | 30       | 25,78%        | 38,67%               | 32,68%                | 2,72%           | \$1.535.767   |
| \$ 56.389.509,00                   | 1-dic-22        | 31-dic-22            | 31       | 27,64%        | 41,46%               | 34,70%                | 2,89%           | \$1.685.039   |
| \$ 56.389.509,00                   | 1-ene-23        | 31-ene-23            | 31       | 28,84%        | 43,26%               | 35,99%                | 3,00%           | \$1.747.379   |
| \$ 56.389.509,00                   | 1-feb-23        | 28-feb-23            | 28       | 30,18%        | 45,27%               | 37,40%                | 3,12%           | \$1.640.391   |
| \$ 56.389.509,00                   | 1-mar-23        | 31-mar-23            | 31       | 30,84%        | 46,26%               | 38,09%                | 3,17%           | \$1.849.698   |
| \$ 56.389.509,00                   | 1-abr-23        | 30-abr-23            | 30       | 31,39%        | 47,09%               | 38,67%                | 3,22%           | \$1.816.934   |
| \$ 56.389.509,00                   | 1-may-23        | 31-may-23            | 31       | 30,27%        | 45,41%               | 37,50%                | 3,12%           | \$1.820.735   |
| \$ 56.389.509,00                   | 1-jun-23        | 30-jun-23            | 30       | 29,76%        | 44,64%               | 36,96%                | 3,08%           | \$1.736.794   |
| \$ 56.389.509,00                   | 1-jul-23        | 25-jul-23            | 25       | 29,36%        | 44,04%               | 36,54%                | 3,04%           | \$1.430.782   |
| CAPITAL                            |                 |                      |          |               |                      |                       |                 | \$ 56.389.509 |
| TOTAL INTERESES DE MORA LIQUIDADOS |                 |                      |          |               |                      |                       |                 | \$ 32.379.969 |