



Señor (a):

**JUEZ PROMISCUO MUNICIPAL DE SAN BENITO (SANTANDER)**  
**E.S.D.**

**Referencia:** Proceso Ejecutivo de Mínima Cuantía No. 2020-00007  
**Demandante:** Banco Agrario de Colombia S.A.  
**Demandado:** Hilda María Casas Santamaría

**CARLOS ANDRÉS HOYOS ROJAS**, identificado con la cédula de ciudadanía No. 7.169.195 de Tunja (Boyacá), abogado en ejercicio, portador de la tarjeta profesional No. 142.837 del Consejo Superior de la Judicatura, residente y con domicilio en la ciudad de Tunja (Boyacá), actuando en calidad de apoderado judicial de la parte demandante dentro del proceso de la referencia, por medio del presente escrito y en atención a lo normado en el artículo 446 del Código General del Proceso, comedidamente me dirijo a usted con el fin de presentar **liquidación del crédito**, lo cual me permito llevar a cabo tomando como base el mandamiento de pago proferido el día 08 de septiembre de 2020 y liquidando intereses moratorios hasta el día 29 de julio de 2021, en los siguientes términos.

| PAGARÉ NO. 015516100008962 |             |      |               |                  |
|----------------------------|-------------|------|---------------|------------------|
| CAPITAL                    |             |      |               | \$ 14.495.539,00 |
| INTERESES REMUNERATORIOS   |             |      |               | \$ 1.851.538,00  |
| OTROS CONCEPTOS            |             |      |               | \$ 362.263,00    |
| INTERESES DE MORA          |             |      |               |                  |
| Desde                      | Hasta       | Días | Tasa Mens (%) |                  |
| 01-jul-2019                | 31-jul-2019 | 31   | 2,41          | \$ 360.987,24    |
| 01-ago-2019                | 30-ago-2019 | 30   | 2,42          | \$ 350.067,27    |
| 01-sep-2019                | 30-sep-2019 | 30   | 2,42          | \$ 350.067,27    |
| 01-oct-2019                | 31-oct-2019 | 31   | 2,39          | \$ 357.617,03    |
| 01-nov-2019                | 30-nov-2019 | 30   | 2,38          | \$ 344.812,63    |
| 01-dic-2019                | 31-dic-2019 | 31   | 2,36          | \$ 354.059,58    |
| 01-ene-2020                | 31-ene-2020 | 31   | 2,35          | \$ 351.438,30    |
| 01-feb-2020                | 29-feb-2020 | 29   | 2,38          | \$ 333.844,34    |
| 01-mar-2020                | 31-mar-2020 | 31   | 2,37          | \$ 354.808,52    |
| 01-abr-2020                | 30-abr-2020 | 30   | 2,34          | \$ 338.652,03    |
| 01-may-2020                | 31-may-2020 | 31   | 2,27          | \$ 340.578,73    |
| 01-jun-2020                | 30-jun-2020 | 30   | 2,27          | \$ 328.323,96    |
| 01-jul-2020                | 31-jul-2020 | 31   | 2,27          | \$ 339.268,09    |
| 01-ago-2020                | 31-ago-2020 | 31   | 2,29          | \$ 342.451,07    |
| 01-sep-2020                | 30-sep-2020 | 30   | 2,29          | \$ 331.404,26    |
| 01-oct-2020                | 31-oct-2020 | 31   | 2,26          | \$ 338.706,39    |
| 01-nov-2020                | 30-nov-2020 | 30   | 2,23          | \$ 323.250,52    |
| 01-dic-2020                | 31-dic-2020 | 31   | 2,18          | \$ 326.910,64    |
| 01-ene-2021                | 31-ene-2021 | 31   | 2,17          | \$ 324.289,37    |
| 01-feb-2021                | 28-feb-2021 | 28   | 2,19          | \$ 296.627,05    |
| 01-mar-2021                | 31-mar-2021 | 31   | 2,18          | \$ 325.974,47    |
| 01-abr-2021                | 30-abr-2021 | 30   | 2,16          | \$ 313.647,23    |
| 01-may-2021                | 31-may-2021 | 31   | 2,15          | \$ 322.417,03    |
| 01-jun-2021                | 30-jun-2021 | 30   | 2,15          | \$ 311.835,28    |
| 01-jul-2021                | 29-jul-2021 | 29   | 2,15          | \$ 300.915,31    |
| INTERESES MORATORIOS       |             |      |               | \$ 8.362.953,59  |
| TOTAL                      |             |      |               | \$ 25.072.293,59 |

| PAGARÉ NO. 015516100008963 |             |      |               |                  |
|----------------------------|-------------|------|---------------|------------------|
| CAPITAL                    |             |      |               | \$ 10.966.168,00 |
| INTERESES REMUNERATORIOS   |             |      |               | \$ 1.339.320,00  |
| OTROS CONCEPTOS            |             |      |               | \$ 219.573,00    |
| INTERESES DE MORA          |             |      |               |                  |
| Desde                      | Hasta       | Días | Tasa Mens (%) |                  |
| 01-jul-2019                | 31-jul-2019 | 31   | 2,41          | \$ 273.094,14    |



**CARLOS HOYOS ABOGADOS S.A.S.**

Consultoría Jurídica Laboral, Civil, Administrativa. Cobro de cartera.

|                             |             |    |      |                         |
|-----------------------------|-------------|----|------|-------------------------|
| 01-ago-2019                 | 30-ago-2019 | 30 | 2,42 | \$ 264.832,96           |
| 01-sep-2019                 | 30-sep-2019 | 30 | 2,42 | \$ 264.832,96           |
| 01-oct-2019                 | 31-oct-2019 | 31 | 2,39 | \$ 270.544,50           |
| 01-nov-2019                 | 30-nov-2019 | 30 | 2,38 | \$ 260.857,72           |
| 01-dic-2019                 | 31-dic-2019 | 31 | 2,36 | \$ 267.853,22           |
| 01-ene-2020                 | 31-ene-2020 | 31 | 2,35 | \$ 265.870,17           |
| 01-feb-2020                 | 29-feb-2020 | 29 | 2,38 | \$ 252.559,99           |
| 01-mar-2020                 | 31-mar-2020 | 31 | 2,37 | \$ 268.419,81           |
| 01-abr-2020                 | 30-abr-2020 | 30 | 2,34 | \$ 256.197,10           |
| 01-may-2020                 | 31-may-2020 | 31 | 2,27 | \$ 257.654,69           |
| 01-jun-2020                 | 30-jun-2020 | 30 | 2,27 | \$ 248.383,71           |
| 01-jul-2020                 | 31-jul-2020 | 31 | 2,27 | \$ 256.663,16           |
| 01-ago-2020                 | 31-ago-2020 | 31 | 2,29 | \$ 259.071,15           |
| 01-sep-2020                 | 30-sep-2020 | 30 | 2,29 | \$ 250.714,02           |
| 01-oct-2020                 | 31-oct-2020 | 31 | 2,26 | \$ 256.238,22           |
| 01-nov-2020                 | 30-nov-2020 | 30 | 2,23 | \$ 244.545,55           |
| 01-dic-2020                 | 31-dic-2020 | 31 | 2,18 | \$ 247.314,50           |
| 01-ene-2021                 | 31-ene-2021 | 31 | 2,17 | \$ 245.331,46           |
| 01-feb-2021                 | 28-feb-2021 | 28 | 2,19 | \$ 224.404,35           |
| 01-mar-2021                 | 31-mar-2021 | 31 | 2,18 | \$ 246.606,27           |
| 01-abr-2021                 | 30-abr-2021 | 30 | 2,16 | \$ 237.280,46           |
| 01-may-2021                 | 31-may-2021 | 31 | 2,15 | \$ 243.914,99           |
| 01-jun-2021                 | 30-jun-2021 | 30 | 2,15 | \$ 235.909,69           |
| 01-jul-2021                 | 29-jul-2021 | 29 | 2,15 | \$ 227.648,51           |
| <b>INTERESES MORATORIOS</b> |             |    |      | <b>\$ 6.326.743,29</b>  |
| <b>TOTAL PAGARÉ</b>         |             |    |      | <b>\$ 18.851.804,29</b> |

|                                   |              |             |                      |                         |
|-----------------------------------|--------------|-------------|----------------------|-------------------------|
| <b>PAGARÉ NO. 015516100008961</b> |              |             |                      |                         |
| <b>CAPITAL</b>                    |              |             |                      | <b>\$ 25.741.278,00</b> |
| <b>INTERESES REMUNERATORIOS</b>   |              |             |                      | <b>\$ 3.799.495,00</b>  |
| <b>OTROS CONCEPTOS</b>            |              |             |                      | <b>\$ 1.137.197,00</b>  |
| <b>INTERESES DE MORA</b>          |              |             |                      |                         |
| <b>Desde</b>                      | <b>Hasta</b> | <b>Días</b> | <b>Tasa Mens (%)</b> |                         |
| 01-jun-2019                       | 30-jun-2019  | 30          | 2,41                 | \$ 621.008,33           |
| 01-jul-2019                       | 31-jul-2019  | 31          | 2,41                 | \$ 641.043,63           |
| 01-ago-2019                       | 30-ago-2019  | 30          | 2,42                 | \$ 621.651,86           |
| 01-sep-2019                       | 30-sep-2019  | 30          | 2,42                 | \$ 621.651,86           |
| 01-oct-2019                       | 31-oct-2019  | 31          | 2,39                 | \$ 635.058,78           |
| 01-nov-2019                       | 30-nov-2019  | 30          | 2,38                 | \$ 612.320,65           |
| 01-dic-2019                       | 31-dic-2019  | 31          | 2,36                 | \$ 628.741,44           |
| 01-ene-2020                       | 31-ene-2020  | 31          | 2,35                 | \$ 624.086,56           |
| 01-feb-2020                       | 29-feb-2020  | 29          | 2,38                 | \$ 592.843,08           |
| 01-mar-2020                       | 31-mar-2020  | 31          | 2,37                 | \$ 630.071,41           |
| 01-abr-2020                       | 30-abr-2020  | 30          | 2,34                 | \$ 601.380,61           |
| 01-may-2020                       | 31-may-2020  | 31          | 2,27                 | \$ 604.802,05           |
| 01-jun-2020                       | 30-jun-2020  | 30          | 2,27                 | \$ 583.039,95           |
| 01-jul-2020                       | 31-jul-2020  | 31          | 2,27                 | \$ 602.474,61           |
| 01-ago-2020                       | 31-ago-2020  | 31          | 2,29                 | \$ 608.126,97           |
| 01-sep-2020                       | 30-sep-2020  | 30          | 2,29                 | \$ 588.509,97           |
| 01-oct-2020                       | 31-oct-2020  | 31          | 2,26                 | \$ 601.477,14           |
| 01-nov-2020                       | 30-nov-2020  | 30          | 2,23                 | \$ 574.030,50           |
| 01-dic-2020                       | 31-dic-2020  | 31          | 2,18                 | \$ 580.530,17           |
| 01-ene-2021                       | 31-ene-2021  | 31          | 2,17                 | \$ 575.875,29           |
| 01-feb-2021                       | 28-feb-2021  | 28          | 2,19                 | \$ 526.752,35           |
| 01-mar-2021                       | 31-mar-2021  | 31          | 2,18                 | \$ 578.867,71           |
| 01-abr-2021                       | 30-abr-2021  | 30          | 2,16                 | \$ 556.976,90           |
| 01-may-2021                       | 31-may-2021  | 31          | 2,15                 | \$ 572.550,38           |
| 01-jun-2021                       | 30-jun-2021  | 30          | 2,15                 | \$ 553.759,24           |
| 01-jul-2021                       | 29-jul-2021  | 29          | 2,15                 | \$ 534.367,48           |
| <b>INTERESES MORATORIOS</b>       |              |             |                      | <b>\$ 15.471.998,93</b> |
| <b>TOTAL PAGARÉ</b>               |              |             |                      | <b>\$ 46.149.968,93</b> |

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CARLOS HOYOS ABOGADOS S.A.S.  
Consultoría Jurídica Laboral, Civil, Administrativa. Cobro de cartera.

| PAGARÉ NO. 4481860003747604 |             |      |               |              |
|-----------------------------|-------------|------|---------------|--------------|
| CAPITAL                     |             |      | \$            | 3.168.132,00 |
| INTERESES REMUNERATORIOS    |             |      | \$            | 135.985,00   |
| OTROS CONCEPTOS             |             |      | \$            | 96.474,00    |
| INTERESES DE MORA           |             |      |               |              |
| Desde                       | Hasta       | Días | Tasa Mens (%) |              |
| 22-jun-2019                 | 30-jun-2019 | 9    | 2,41          | \$ 22.929,36 |
| 01-jul-2019                 | 31-jul-2019 | 31   | 2,41          | \$ 78.897,05 |
| 01-ago-2019                 | 30-ago-2019 | 30   | 2,42          | \$ 76.510,39 |
| 01-sep-2019                 | 30-sep-2019 | 30   | 2,42          | \$ 76.510,39 |
| 01-oct-2019                 | 31-oct-2019 | 31   | 2,39          | \$ 78.160,46 |
| 01-nov-2019                 | 30-nov-2019 | 30   | 2,38          | \$ 75.361,94 |
| 01-dic-2019                 | 31-dic-2019 | 31   | 2,36          | \$ 77.382,94 |
| 01-ene-2020                 | 31-ene-2020 | 31   | 2,35          | \$ 76.810,04 |
| 01-feb-2020                 | 29-feb-2020 | 29   | 2,38          | \$ 72.964,72 |
| 01-mar-2020                 | 31-mar-2020 | 31   | 2,37          | \$ 77.546,63 |
| 01-abr-2020                 | 30-abr-2020 | 30   | 2,34          | \$ 74.015,48 |
| 01-may-2020                 | 31-may-2020 | 31   | 2,27          | \$ 74.436,58 |
| 01-jun-2020                 | 30-jun-2020 | 30   | 2,27          | \$ 71.758,19 |
| 01-jul-2020                 | 31-jul-2020 | 31   | 2,27          | \$ 74.150,13 |
| 01-ago-2020                 | 31-ago-2020 | 31   | 2,29          | \$ 74.845,80 |
| 01-sep-2020                 | 30-sep-2020 | 30   | 2,29          | \$ 72.431,42 |
| 01-oct-2020                 | 31-oct-2020 | 31   | 2,26          | \$ 74.027,36 |
| 01-nov-2020                 | 30-nov-2020 | 30   | 2,23          | \$ 70.649,34 |
| 01-dic-2020                 | 31-dic-2020 | 31   | 2,18          | \$ 71.449,30 |
| 01-ene-2021                 | 31-ene-2021 | 31   | 2,17          | \$ 70.876,39 |
| 01-feb-2021                 | 28-feb-2021 | 28   | 2,19          | \$ 64.830,54 |
| 01-mar-2021                 | 31-mar-2021 | 31   | 2,18          | \$ 71.244,69 |
| 01-abr-2021                 | 30-abr-2021 | 30   | 2,16          | \$ 68.550,46 |
| 01-may-2021                 | 31-may-2021 | 31   | 2,15          | \$ 70.467,18 |
| 01-jun-2021                 | 30-jun-2021 | 30   | 2,15          | \$ 68.154,44 |
| 01-jul-2021                 | 29-jul-2021 | 29   | 2,15          | \$ 65.767,78 |
| INTERESES MORATORIOS        |             |      | \$            | 1.850.728,99 |
| TOTAL                       |             |      | \$            | 5.251.319,99 |

| TOTALES                       |                   |
|-------------------------------|-------------------|
| PAGARÉ NO. 015516100008962    | \$ 25.072.293,59  |
| PAGARÉ NO. 015516100008963    | \$ 18.851.804,29  |
| PAGARÉ NO. 015516100008961    | \$ 46.149.968,93  |
| PAGARÉ NO. 4481860003747604   | \$ 5.251.319,99   |
| COSTAS Y AGENCIAS EN DERECHO  | \$ 6.278.400,00   |
| TOTAL LIQUIDACIÓN DEL CRÉDITO | \$ 101.603.786,80 |

De conformidad con la anterior tabla, la actualización de la liquidación del crédito arroja un monto total de **CIENTO UN MILLONES SEISCIENTOS TRES MIL SETECIENTOS OCHENTA Y SEIS PESOS CON OCHENTA CENTAVOS MONEDA LEGAL CORRIENTE (\$ 101.603.786,80)** hasta el día 29 de julio de 2021.

Atentamente,

  
CARLOS ANDRÉS HOYOS ROJAS  
C.C. No 7.169.195 – de Tunja.  
T. P. No 142.837 del C. S. de la Jud.