RECURSO DE REPOSICIÓN EN SUBSIDIO DE APELACIÓN EJECUTIVO No. 2023-00213

Nelson Lesmes <nelsonlesmes11@hotmail.com>

Vie 01/03/2024 11:13

Para:Juzgado 01 Promiscuo Municipal - Meta - Granada <j01prmgranada@cendoj.ramajudicial.gov.co>

2 archivos adjuntos (776 KB)

XML FACTURAS AGRINGRA.zip; RECURSO DE REPOSICIÓN EN SUBSIDIO DE APELACIÓN EJECUTIVO No. 2023-00213.pdf;

Buenos Días,

Por medio del presente, me permito adjuntar RECURSO DE REPOSICIÓN EN SUBSIDIO APELACIÓN CONTRA AUTO QUE NIEGA MANDAMIENTO DE PAGO CALENDADO EL DIA 26 DE FEBRERO DE 2024, FIJADO EN ESTADO No. 005 DEL 27 DE FEBRERO DE 2024, con destino al siguiente proceso:

CLASE DE PROCESO: EJECUTIVO SINGULAR
Radicado. 503134089001-2023-00213-00
Demandante: PROCESOS Y ADITIVOS ESPECIALES S.A.S.
Demandado: AGRINGRA S.A.

1. ADJUNTO: Archivos XML de las facturas electrónicas No. F3-34, F3-102, F3-132, F3-134, F3-168, F3-199, F3-228, F3-273, D-003, F3-315, F3-348, F3-384, F3-402, F3-435, F3-488, F3-508, F3-549, F3-597, F3-623, F3-642, F3-660, F3-710, F3-733, F3-793, F3-853, F3-901, F3-934, F3-970, F3-998, F3-1025, F3-1044, F3-1072, F3-1103, F3-1123, F3-1139, F3-1164, F3-1181, F3-1199, F3-1213, F3-1232, F3-1240, F3-1264, F3-1281, F3-1295, F3-1309, F3-1332, F3-1346, F3-1362, F3-1383, F3-1396.

Sin otro particular, agradezco su acostumbrada colaboración.

Cordialmente;

Nelson Guillermo Lesmes Lancheros
ABOGADO
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CARRERA 11 No. 8 – 38, Oficina 202.
Chía, Cundinamarca.

DR. JAIME ROBERTO CORREDOR FANDIÑO
JUEZ PRIMERO PROMISCUO MUNICIPAL DE GRANADA – META.
E.S.D.

CLASE DE PROCESO: EJECUTIVO SINGULAR
Radicado. 503134089001**-2023-**00**213-**00
Demandante: PROCESOS Y ADITIVOS ESPECIALES S.A.S.
Demandado: AGRINGRA S.A.

REF. RECURSO DE REPOSICIÓN EN SUBSIDIO APELACIÓN CONTRA AUTO QUE NIEGA MANDAMIENTO DE PAGO CALENDADO EL DIA 26 DE FEBRERO DE 2024, FIJADO EN ESTADO No. 005 DEL 27 DE FEBRERO DE 2024.

NELSON GUILLERMO LESMES LANCHEROS, mayor de edad, domiciliado y residente en el municipio de Chía, Cundinamarca, identificado con cédula de ciudadanía No. 80.449.188 expedida en Chía, Abogado en ejercicio, titular de la T.P. No. 332.915 del C.S. de la Jud., con correo inscrito en el registro nacional de Abogados: nelsonlesmes11@hotmail.com , Obrando como apoderado Judicial de la empresa PROCESOS Y ADITIVOS ESPECIALES SAS, sociedad comercial legalmente constituida, identificada con Nit No. 832.006.798-4, con domicilio principal en el municipio de Tocancipa, Cundinamarca, representada legalmente por el señor JOSÉ BERNARDO ANTONIO RESTREPO CHEBAIR, mayor de edad, domiciliado y residente en el municipio de Chía, Cundinamarca, identificado con cédula de ciudadanía número 79.150.382 expedida en Bogotá D.C. por medio del presente escrito, encontrándome dentro del término legal, me permito interponer **RECURSO DE REPOSICIÓN Y EN SUBSIDIO APELACIÓN**, contra el AUTO QUE NIEGA MANDAMIENTO DE PAGO CALENDADO EL DIA 26 DE FEBRERO DE 2024, FIJADO EN ESTADO No. 005 DEL 27 DE FEBRERO DE 2024, sustentando el recurso en los siguientes términos:

El honorable Juez niega mandamiento de pago, indicando que las facturas físicas y electrónicas de venta que se pretenden ejecutar no reúnen los requisitos previstos en el Articulo 774 del Código de Comercio y el Decreto 3327 del 3 de septiembre de 2009, que reglamento parcialmente la Ley 1231 de 2008, para que preste merito ejecutivo, principalmente la fecha de recibo de la factura, la aceptación, y la firma que dé cuenta la aceptación expresa.

Ahora bien, se debe tener presente H. Juez, que las facturas físicas No. F1-3415, F1-3465, F1-3488, F1-3532, F1-3569, F1-3632, se entregaron de manera física en la dirección principal de la sociedad demandada, tal como consta en las guías No. 995257325, 998100736, 998101118, 998101118, 9101832415, enviadas por el servicio de mensajería de SERVIENTREGA donde se evidencia la firma de aceptación y recibido de las facturas por parte de la pasiva, de igual manera la guía de la empresa de mensajería ENVIA, que también se encuentra debidamente firmada y aceptada. Las guías nombradas están debidamente relacionadas y anexas a la demanda, identificándose en ellas la fecha de entrega, el número de factura y la firma de la persona quien recibió en nombre de la sociedad demandada AGRINGRA.

Aunado a lo anterior es preciso traer a colación el inciso 2º del Art. 773, del Código de comercio que indica:

(...)

> *El comprador o beneficiario del servicio deberá aceptar de manera expresa el contenido de la factura, por escrito colocado en el cuerpo de la misma* ***o en documento separado****, físico o electrónico. Igualmente, deberá constar el recibo de la mercancía o del servicio por parte del comprador del bien o beneficiario del servicio, en la factura y/o* ***en la guía de transporte****, según el caso,* ***indicando el nombre, identificación o la firma de quien recibe****,* ***y la fecha de recibo****. El comprador del bien o beneficiario del servicio no podrá alegar falta de representación o indebida representación por razón de la persona que reciba la mercancía o el servicio en sus dependencias, para efectos de la aceptación del título valor.* (Negrillas y Subrayado propio).

(…)

Como se colige de la norma citada, la sociedad demandada AGRINGRA, si recibió las facturas y plasmo su firma en documento separado, que, para el caso constan en las guías de transporte de las facturas cambiarias de compraventa contenidas en el expediente, donde se puede identificar la fecha de recibo de cada una, aceptando así, tácitamente el contenido de estas. Por otro lado, dentro del término estipulado por la ley comercial no fue reclamado su contenido. Siendo así, H. Juez, se tiene que los títulos valores "Facturas Cambiarias de Compraventa" si reúnen los requisitos legales y prestan merito ejecutivo, cumpliendo de esta manera a cabalidad con los requisitos estipulados en el Art. 774 del Código de Comercio.

Ahora bien, como se manifestó en el escrito de demanda la pasiva sociedad AGRINGRA SAS, expidió certificados de retención en la fuente a título de renta, realizados a mi representada para los años 2019 a 2021, manifestando que los valores retenidos fueron consignados a expensas de la DIAN. (Certificado Anexos en el escrito de demanda), hecho que da cuenta de la relación comercial que existe entre las partes y que efectivamente se hace retención sobre los valores cancelados a mi representada por el servicio prestado.

En lo que se refiere a las facturas electrónicas No. F3-34, F3-102, F3-132, F3-134, F3-168, F3-199, F3-228, F3-273, D-003, F3-315, F3-348, F3-384, F3-402, F3-435, F3-488, F3-508, F3-549, F3-597, F3-623, F3-642, F3-660, F3-710, F3-733, F3-793, F3-853, F3-901, F3-934, F3-970, F3-998, F3-1025, F3-1044, F3-1072, F3-1103, F3-1123, F3-1139, F3-1164, F3-1181, F3-1199, F3-1213, F3-1232, F3-1240, F3-1264, F3-1281, F3-1295, F3-1309, F3-1332, F3-1346, F3-1362, F3-1383, F3-1396, estas fueron enviadas mediante la plataforma de facturación SIIGO, autorizada por la Ley para dicho fin, y en cada factura consta el código único de facturación electrónica (CUFE), el cual permite validar la autenticidad y la pertinencia de cada factura (Titulo Valor), del cual se puede constatar la identidad del emisor de la factura, o en un código de respuesta rápida QR. En este punto la corte ha reiterado que en caso de dudas "la verificación que puede hacer el juez en el servicio informático electrónico de validación previa de factura electrónica de venta, a través del Código Único de Facturación Electrónica (https://catalogo-vpfe.dian.gov.co/User/SearchDocument), así como de la réplica que puede elevar el ejecutado en ejercicio del derecho de contradicción".

De las facturas electrónicas descritas en el párrafo anterior se anexo como prueba de la fecha de creación y la fecha de remisión al deudor, un informe de facturación descargado del programa SIIGO, así como el informe de seguimiento de envío de emails por cliente del mismo programa, donde se puede verificar la fecha en la que fue recibida la facturación. Sobre el particular, nótese que en numera 7º del artículo 11 de la Resolución 42 de 5 de mayo de 2020, prescribe que *"de conformidad con el artículo 618 del Estatuto Tributario, deberá entregarse al adquiriente [sic] la factura*

electrónica de venta en el formato electrónico de generación, junto con el documento electrónico de validación que contiene el valor: 'documento validado por la DIAN', los cuales se deben incluir en el contenedor electrónico (…)".

Requisito este, que se encuentra en el cuerpo de las facturas electrónicas aportadas para su recaudo ejecutivo dentro del plenario y se puede comprobar la validación por la DIAN para tal efecto.

Como si fuera poco, la Corte Suprema de Justicia, Sala Civil en sentencia STC-11618 de octubre 27 de 2023 indica lo siguiente:

> *Luego, si el emisor del documento es facturador electrónico, la factura deberá remitirse de forma electrónica, a). «por correo electrónico a la dirección electrónica suministrada por el adquirente en el procedimiento de habilitación como facturador electrónico, que* ***podrá ser consultada en el servicio informático electrónico de validación previa****», o b). por otros medios de «transmisión electrónica», si la entrega no se da de la forma anotada y existe acuerdo entre el facturador electrónico y el adquirente. En ambos casos, el formato electrónico de generación y el documento de validación deben ser incluidos en el contenedor electrónico de la factura, que es «un instrumento obligatorio que se utiliza para incluir la información de la factura electrónica de venta, las notas débito, notas crédito y los demás instrumentos y en general la información electrónica derivada de los sistemas de facturación, junto con la validación realizada por la (…) DIAN, cuando fuere el caso»*

La validación a que se refiere la Corte es el código único de facturación electrónica (CUFE), que se encuentra como ya se ha mencionado en repetidas ocasiones en el cuerpo de las facturas aportadas para su recaudo y puede ser consultado en la página que la DIAN dispuso para tal efecto https://catalogo-vpfe.dian.gov.co/User/SearchDocument .

Con relación a los requisitos sustanciales de la factura electrónica de venta para ser título valor la Corte Suprema de Justicia, Sala Civil en sentencia STC-11618 de octubre 27 de 2023, expresa lo siguiente:

(…)

> ***4.- De los requisitos sustanciales de la factura electrónica de venta para ser título valor.***
>
> *Respecto a los requisitos sustanciales, importa recordar, en primer lugar, cuáles son los de las facturas físicas, para luego precisar los de las electrónicas.*
>
> *La Sala, con base en el estudio que realizó de los artículos 772 y siguientes del Código de Comercio, modificados por la Ley 1231 de 2008, del Decreto 3327 de 2009, por medio de la cual el Gobierno Nacional reglamentó dicha Ley, y de la 1676 de 2013, que la varió parcialmente, concluyó que para que una factura tenga la calidad de título valor debe cumplir con los siguientes requisitos: «(i) La mención del derecho que en el título se incorpora, (ii) La firma de quien lo crea, esto es, la del vendedor o prestador del servicio, (iii) La fecha de vencimiento, (iv) El recibido de la factura (fecha, datos o firma de quien recibe), el cual puede constar en el documento o en otro distinto, físico o electrónico, y (v) Su aceptación, la cual puede ser expresa o tácita», dentro de los tres días siguientes al recibido de la factura (STC7273-2020, reiterada, entre otras, en STC9542-2020, STC6381-2021, STC9695-2019).*
>
> *Y al respecto de la discusión que en su momento se suscitó sobre si el juez debía verificar en el cuerpo de la factura o en hoja adherida a ella la constancia de recibido de las mercancías, como los alcances de su aceptación de la factura y las condiciones para su configuración, sostuvo, in extenso:*
>
> *No hay duda de que el juez al examinar los "requisitos de la factura como título valor" debe indagar por la entrega de las mercancías vendidas o la prestación de los servicios*

incorporados en ella. Aunque el inciso final del artículo 774 del estatuto mercantil, modificado por el 3° de la Ley 1231 de 2008, establece que "[l]a omisión de requisitos adicionales que establezcan normas distintas a las señaladas en el presente artículo, no afectará la calidad de título valor de las facturas", una lectura armónica de los artículos 772 y 773 de la misma obra y el Decreto 3327 de 2009, permite deducir además, de las exigencias allí contempladas, [lo es] que el "beneficiario de la mercancía o de los servicios, las recibió".

Ahora, eso no significa (…) que las facturas para valer como títulos valores y, por tanto, para prestar mérito ejecutivo, deban tener en su cuerpo o en hoja adherida a él "constancia de recibido de las mercancías o de la prestación del servicio". No. Esto, porque el requisito que por ese camino se estudia es el de la "aceptación de las facturas", y no aquél, que no fue contemplado por el legislador". (…).

Ahora, que una "factura se acepte" significa que el comprador de las mercancías o adquirente del servicio ratifica que su contenido corresponde a la realidad, pasando por la recepción de los bienes que allí aparecen registrados, como los demás aspectos que constan en el documento (plazo para el pago, valor a sufragar, entre otros).

Esa confirmación, como se desprende de la normatividad descrita líneas atrás, puede darse de dos maneras, expresa o tácitamente. Ocurrirá lo primero, cuando aquél por cualquier medio y dentro del plazo consagrado en la ley, revele o exteriorice su aquiescencia, y lo segundo, cuando vencido ese lapso, no lo hace, caso en el cual, la ley entiende, ante el silencio del comprador o beneficiario de la factura, que se "recibió la mercancía" y no hay reparos en su contra (inciso 3° del art. 773 del Co. Co., modificado por el art. 86 de la Ley 1676).

Para que opere cualquiera de las dos modalidades de aceptación, debe tratarse de una «factura» que reúna la totalidad de los requisitos del artículo 774 ejusdem. Esto, porque su eficacia cambiaria depende de que así acontezca y, segundo, porque la configuración del fenómeno aludido está supeditada a uno de ellos, esto es, al del numeral 2°, según el cual, deberá reunir, "[l]a fecha de recibo de la factura, con indicación del nombre, o identificación o firma de quien sea el encargado de recibirla según lo establecido en la presente ley".

La anotada regla no prevé cosa distinta al "recibido de la factura", o lo que es lo mismo, a la "constancia de haberse entregado la factura al comprador" mencionada por el Tribunal; para su satisfacción es suficiente que el comprador o receptor del servicio indique "fecha de recibo de la factura" el "nombre", o "identificación" o "firma de quien sea el encargado de recibirla".

Significa entonces, que para "recibir la factura" su beneficiario deberá imponer una rúbrica en señal de que determinado día le fue entregado por el vendedor el documento. Dicho acto, contrario a lo argüido por el Colegiado de Cartagena, tiene toda relevancia jurídica, pues, además de que, a través de él, el vendedor avisa al comprador que libró una «factura» a su cargo en virtud de unas mercancías o unos servicios, constituye el punto de partida de la "aceptación de las facturas". (…)

En conclusión, habrá «aceptación expresa de la factura» si el "comprador de las mercancías o beneficiario del servicio" la recibe bajo su firma o la de un dependiente y en ese momento ratifica su contenido o lo hace dentro de los tres (3) días hábiles siguientes. Pero, si recibe la «factura», y no la acepta en ese instante ni después, se produce la aceptación implícita, con efectos para obligarlo. De modo que en este evento se entenderá que la mercancía se entregó y el servicio se prestó y, por ende, que las «facturas» corresponden efectivamente a dicha circunstancia.

(…)

Es de tener en cuenta H. Juez, que, con la documental aportada se puede evidenciar que las facturas cumplen con los requisitos para ser cobradas ejecutivamente y

prestan merito ejecutivo, a pesar de esto me permito remitir adjunto al recurso el formato XML de las facturas electrónicas que dan cuenta el cumplimiento del numeral 2° del artículo 3° del Decreto 2245 de 2015, que determina que para que una factura electrónica sea enviada al adquiriente o comprador esta debe ser remitida con el formato electrónico de generación XML, documento que garantiza la trazabilidad de la comunicación, esto es, da una evidencia sin lugar a elucubraciones de las personas o empresas a las que fue enviado el titulo valor factura electrónica.

El decreto referido, deja claro que el obligado a facturar electrónicamente, debe poner a disposición del adquirente la factura en formato electrónico de generación, lo que fue cumplido por mi poderdante y que puede validar este despacho con los archivos XML anexos, que junto con la documental aportada no deja lugar a dudas del cumplimiento de los requisitos legales exigidos para su cobro ejecutivo.

Con relación a la firma electrónica o digital de la persona destinada al recibo del documento, como requisito de validez de las facturas electrónicas, se debe indicar que la Resolución DIAN 000042 del 05 de mayo del 2020, estableció que la firma electrónica sobre todos los documentos que componen la facturación electrónica, se hará mediante la inclusión de una etiqueta i.e. dentro de los archivos XML que se anexan.

Téngase presente H. Juez, que en el presente caso opero la aceptación tácita de las facturas electrónicas al encontrase validado con el XML el envío de las mismas, sin rechazo alguno de las facturas enviadas dentro del término legal estipulado en el Articulo 773 del Código de Comercio.

Por lo esbozado, solicito respetuosamente H. Juez la siguiente:

II PETICIÓN

PRIMERA: Admitir el presente recurso de reposición y en subsidio de apelación.

SEGUNDA: Revocar el auto del 26 de febrero de 2024, notificado por estado No. 005 del 27 de febrero de 2024, mediante el cual se niega el mandamiento de pago.

TERCERA: En caso de que su posición siga incólume, conceder el recurso de apelación ante el superior jerárquico.

III ANEXOS

1. Archivos XML de las facturas electrónicas No. F3-34, F3-102, F3-132, F3-134, F3-168, F3-199, F3-228, F3-273, D-003, F3-315, F3-348, F3-384, F3-402, F3-435, F3-488, F3-508, F3-549, F3-597, F3-623, F3-642, F3-660, F3-710, F3-733, F3-793, F3-853, F3-901, F3-934, F3-970, F3-998, F3-1025, F3-1044, F3-1072, F3-1103, F3-1123, F3-1139, F3-1164, F3-1181, F3-1199, F3-1213, F3-1232, F3-1240, F3-1264, F3-1281, F3-1295, F3-1309, F3-1332, F3-1346, F3-1362, F3-1383, F3-1396.

Del Honorable Juez, con toda atención;

Nelson Guillermo Lesmes L.

Nelson Guillermo Lesmes Lancheros
C.C. No. 80.449.188 de Chía
T.P. No. 332.915 del C.S. de la Jud.

RE: RECURSO DE REPOSICIÓN EN SUBSIDIO DE APELACIÓN EJECUTIVO No. 2023-00213

Juzgado 01 Promiscuo Municipal - Meta - Granada
<j01prmgranada@cendoj.ramajudicial.gov.co>

Mié 06/03/2024 8:13

Para:Nelson Lesmes <nelsonlesmes11@hotmail.com>

Buenos días,

Me permito indicarle que los documentos allegados en la carpeta Zip, se encuentran dañados o no son compatibles por lo que fue imposible si visualización.

Cordial saludo,

Laura R.

Rama Judicial
Consejo Superior de la Judicatura
República de Colombia

AVISO DE ADVERTENCIA LEGAL: Con base en lo establecido en los artículos 95 de la Ley de 270 de 1996 y 24 de la Ley 527 de 1999, por medio de la cual se reglamenta el acceso y uso de los mensajes de datos para el estado colombiano, entre otras disposiciones, se advierte que conforme a esta disposición legal, el tiempo exacto de la recepción de este mensaje de datos que contiene la presente comunicación de la información o notificación, corresponde al día y hora en que le está siendo enviado al correo electrónico institucional del servidor judicial o funcionario público. En tratándose de personas naturales o jurídicas usuarias, la comunicación de la presente información o notificación se da por recibida con el presente envío al correo electrónico que previamente fue suministrado a este juzgado. La presente comunicación electrónica tiene plena eficacia, validez jurídica y probatoria, a menos que exista un pacto o compromiso distinto al respecto. *"Por favor antes de imprimir el contenido en este correo electrónico piense en los árboles que hay que talar, por ejemplo: Una hoja de papel tamaño carta necesita 2 litros de agua + 10 gramos de insumos + una bombilla de 40W prendida por una hora + 14 gramos de madera pura y para la producción de una tonelada de papel se requieren aproximadamente 15 arboles; EL CALENTAMIENTO GLOBAL NO ES UN MITO, ES UN HECHO "*

De: Nelson Lesmes <nelsonlesmes11@hotmail.com>
Enviado: viernes, 1 de marzo de 2024 11:13
Para: Juzgado 01 Promiscuo Municipal - Meta - Granada <j01prmgranada@cendoj.ramajudicial.gov.co>
Asunto: RECURSO DE REPOSICIÓN EN SUBSIDIO DE APELACIÓN EJECUTIVO No. 2023-00213

Buenos Días,

Por medio del presente, me permito adjuntar RECURSO DE REPOSICIÓN EN SUBSIDIO APELACIÓN CONTRA AUTO QUE NIEGA MANDAMIENTO DE PAGO CALENDADO EL DIA 26 DE FEBRERO DE 2024, FIJADO EN ESTADO No. 005 DEL 27 DE FEBRERO DE 2024, con destino al siguiente proceso:

CLASE DE PROCESO: EJECUTIVO SINGULAR
Radicado. 503134089001-2023-00213-00
Demandante: PROCESOS Y ADITIVOS ESPECIALES S.A.S.
Demandado: AGRINGRA S.A.

1. ADJUNTO: Archivos XML de las facturas electrónicas No. F3-34, F3-102, F3-132, F3-134, F3-168, F3-199, F3-228, F3-273, D-003, F3-315, F3-348, F3-384, F3-402, F3-435, F3-488, F3-508, F3-549, F3-597, F3-623, F3-642, F3-660, F3-710, F3-733, F3-793, F3-853, F3-901, F3-934, F3-970, F3-998, F3-1025, F3-1044, F3-1072, F3-1103, F3-1123, F3-1139, F3-1164, F3-1181, F3-1199, F3-1213, F3-1232, F3-1240, F3-1264, F3-1281, F3-1295, F3-1309, F3-1332, F3-1346, F3-1362, F3-1383, F3-1396.

Sin otro particular, agradezco su acostumbrada colaboración.

Cordialmente;

Nelson Guillermo Lesmes Lancheros
ABOGADO
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RE: RECURSO DE REPOSICIÓN EN SUBSIDIO DE APELACIÓN EJECUTIVO No. 2023-00213

Nelson Lesmes <nelsonlesmes11@hotmail.com>

Mié 06/03/2024 11:56

Para:Juzgado 01 Promiscuo Municipal - Meta - Granada <j01prmgranada@cendoj.ramajudicial.gov.co>

50 archivos adjuntos (2 MB)

d-003-1 (6).pdf; f-003-34.pdf; f-003-102.pdf; f-003-132.pdf; f-003-134.pdf; f-003-168.pdf; f-003-199.pdf; f-003-228.pdf; f-003-273.pdf; F-003-315 (1).pdf; F-003-348.pdf; F-003-384.pdf; f-003-402 (2).pdf; f-003-435.pdf; f-003-488.pdf; f-003-508.pdf; f-003-549.pdf; f-003-597.pdf; f-003-623.pdf; f-003-642.pdf; f-003-660.pdf; f-003-710.pdf; f-003-733.pdf; f-003-793.pdf; f-003-853.pdf; f-003-901.pdf; f-003-934.pdf; f-003-970.pdf; f-003-998.pdf; f-003-1025.pdf; f-003-1044.pdf; f-003-1072.pdf; f-003-1103.pdf; f-003-1123.pdf; f-003-1139.pdf; f-003-1164.pdf; f-003-1181.pdf; f-003-1199.pdf; f-003-1213.pdf; f-003-1232.pdf; f-003-1240.pdf; f-003-1264.pdf; f-003-1281.pdf; f-003-1295.pdf; f-003-1309.pdf; f-003-1332.pdf; f-003-1346.pdf; f-003-1362.pdf; f-003-1383.pdf; f-003-1396.pdf;

Buenos Días,

Por medio del presente, me permito adjuntar los archivo en formato PDF para el estudio del RECURSO DE REPOSICIÓN EN SUBSIDIO APELACIÓN CONTRA AUTO QUE NIEGA MANDAMIENTO DE PAGO CALENDADO EL DIA 26 DE FEBRERO DE 2024, FIJADO EN ESTADO No. 005 DEL 27 DE FEBRERO DE 2024, dentro del siguiente proceso:

CLASE DE PROCESO: EJECUTIVO SINGULAR
Radicado. 503134089001-2023-00213-00
Demandante: PROCESOS Y ADITIVOS ESPECIALES S.A.S.
Demandado: AGRINGRA S.A.

1. ADJUNTO: Archivos XML convertidos a PDF de las facturas electrónicas No. F3-34, F3-102, F3-132, F3-134, F3-168, F3-199, F3-228, F3-273, D-003, F3-315, F3-348, F3-384, F3-402, F3-435, F3-488, F3-508, F3-549, F3-597, F3-623, F3-642, F3-660, F3-710, F3-733, F3-793, F3-853, F3-901, F3-934, F3-970, F3-998, F3-1025, F3-1044, F3-1072, F3-1103, F3-1123, F3-1139, F3-1164, F3-1181, F3-1199, F3-1213, F3-1232, F3-1240, F3-1264, F3-1281, F3-1295, F3-1309, F3-1332, F3-1346, F3-1362, F3-1383, F3-1396.

Sin otro particular, agradezco su acostumbrada colaboración.

Cordialmente;

Nelson Guillermo Lesmes Lancheros
ABOGADO
TELÉFONO: 315 843 60 35
EMAIL. nelsonlesmes11@hotmail.com
CARRERA 11 No. 8 – 38, Oficina 202.
Chía, Cundinamarca.

De: Juzgado 01 Promiscuo Municipal - Meta - Granada <j01prmgranada@cendoj.ramajudicial.gov.co>
Enviado: miércoles, 6 de marzo de 2024 8:13 a. m.
Para: Nelson Lesmes <nelsonlesmes11@hotmail.com>
Asunto: RE: RECURSO DE REPOSICIÓN EN SUBSIDIO DE APELACIÓN EJECUTIVO No. 2023-00213

Buenos días,

Me permito indicarle que los documentos allegados en la carpeta Zip, se encuentran dañados o no son compatibles por lo que fue imposible si visualización.

Cordial saludo,

Laura R.

Rama Judicial
Consejo Superior de la Judicatura
República de Colombia

AVISO DE ADVERTENCIA LEGAL: Con base en lo establecido en los artículos 95 de la Ley de 270 de 1996 y 24 de la Ley 527 de 1999, por medio de la cual se reglamenta el acceso y uso de los mensajes de datos para el estado colombiano, entre otras disposiciones, se advierte que conforme a esta disposición legal, el tiempo exacto de la recepción de este mensaje de datos que contiene la presente comunicación de la información o notificación, corresponde al día y hora en que le está siendo enviado al correo electrónico institucional del servidor judicial o funcionario público. En tratándose de personas naturales o jurídicas usuarias, la comunicación de la presente información o notificación se da por recibida con el presente envío al correo electrónico que previamente fue suministrado a este juzgado. La presente comunicación electrónica tiene plena eficacia, validez jurídica y probatoria, a menos que exista un pacto o compromiso distinto al respecto. *"Por favor antes de imprimir el contenido en este correo electrónico piense en los árboles que hay que talar, por ejemplo: Una hoja de papel tamaño carta necesita 2 litros de agua + 10 gramos de insumos + una bombilla de 40W prendida por una hora + 14 gramos de madera pura y para la producción de una tonelada de papel se requieren aproximadamente 15 arboles; EL CALENTAMIENTO GLOBAL NO ES UN MITO, ES UN HECHO "*

De: Nelson Lesmes <nelsonlesmes11@hotmail.com>
Enviado: viernes, 1 de marzo de 2024 11:13
Para: Juzgado 01 Promiscuo Municipal - Meta - Granada <j01prmgranada@cendoj.ramajudicial.gov.co>
Asunto: RECURSO DE REPOSICIÓN EN SUBSIDIO DE APELACIÓN EJECUTIVO No. 2023-00213

Buenos Días,

Por medio del presente, me permito adjuntar RECURSO DE REPOSICIÓN EN SUBSIDIO APELACIÓN CONTRA AUTO QUE NIEGA MANDAMIENTO DE PAGO CALENDADO EL DIA 26 DE FEBRERO DE 2024, FIJADO EN ESTADO No. 005 DEL 27 DE FEBRERO DE 2024, con destino al siguiente proceso:

CLASE DE PROCESO: EJECUTIVO SINGULAR
Radicado. 503134089001-2023-00213-00
Demandante: PROCESOS Y ADITIVOS ESPECIALES S.A.S.
Demandado: AGRINGRA S.A.

1. ADJUNTO: Archivos XML de las facturas electrónicas No. F3-34, F3-102, F3-132, F3-134, F3-168, F3-199, F3-228, F3-273, D-003, F3-315, F3-348, F3-384, F3-402, F3-435, F3-488, F3-508, F3-549, F3-597, F3-623, F3-642, F3-660, F3-710, F3-733, F3-793, F3-853, F3-901, F3-934, F3-970, F3-998, F3-1025, F3-1044, F3-1072, F3-1103, F3-1123, F3-1139, F3-1164, F3-1181, F3-1199, F3-1213, F3-1232, F3-1240, F3-1264, F3-1281, F3-1295, F3-1309, F3-1332, F3-1346, F3-1362, F3-1383, F3-1396.

Sin otro particular, agradezco su acostumbrada colaboración.

Cordialmente;

Nelson Guillermo Lesmes Lancheros
ABOGADO
TELÉFONO: 315 843 60 35
EMAIL. nelsonlesmes11@hotmail.com
CARRERA 11 No. 8 – 38, Oficina 202.
Chía, Cundinamarca.

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2"
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PRODUCTO: MEZCLA IMPULSON SACO X 46KG
20 POSICIONES (425 SACOS)
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COBRADO</cbc:Description>
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