

*Andres Galvis*

Especialista en Derecho Comercial U.P.B

SEÑOR

JUEZ NOVENO CIVIL DEL CIRCUITO DE ORALIDAD DE MEDELLÍN.

02 DE EJECUCION

E.S.D

DEMANDANTE: MARGARITA ROJAS VIUDA DE CALLEJAS.

DEMANDADO: ADRIANA MARIA BEDOYA SEPÚLVEDA

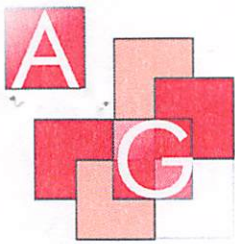
RADICADO: 2012-751

ASUNTO: ANEXO LIQUIDACIÓN DE CRÉDITO y SOLICITUD MEDIDA CAUTELAR

ANDRES ALBEIRO GALVIS ARANGO, abogado titulado inscrito y en ejercicio, persona mayor, vecino y residente de Medellín, identificado con cedula de ciudadanía No. 8.433.796 de Itagüí, y portador de la tarjeta profesional No. 155.255 del C.S.J, actuando como apoderado de la parte demandante, comedidamente me permito indicar lo siguiente:

**PRIMERO:** La diligencia de remate sobre el bien inmueble objeto de la litis, se realizó el 30 de septiembre de 2014 por valor de **SETENTA Y CINCO MILLONES QUINIENTOS MIL PESOS (\$75.500.000)**, sino la suma de **SESENTA Y UN MILLONES NOVECIENTOS MIL NOVECIENTOS SESENTA Y TRES PESOS (\$61.900.963)**

**SEGUNDO:** El 04 de diciembre de 2014, el Juzgado reconoció gastos a la rematante por la suma de **ONCE MILLONES QUINIENTOS MIL PESOS (\$11.500.000)** y por **DOS MILLONES NOVENTA Y NUEVE MIL TREINTA Y SIETE PESOS (\$2.099.037)**, para un total reconocido de **TRECE MILLONES QUINIENTOS NOVENTA Y NUEVE MIL TREINTA Y SIETE PESOS (\$13.599.037)**.



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**TERCERO:** Por lo anterior, los **TRECE MILLONES QUINIENTOS NOVENTA Y NUEVE MIL TREINTE Y SIETE PESOS (\$13.599.037)**, deben ser descontados al momento de realizar la liquidación del crédito, teniendo en cuenta que la parte demandante no recibió los **SETENTA Y CINCO MILLONES QUINIENTOS MIL PESOS (\$75.500.000)**, que fueron objeto de la diligencia de remate, por lo tanto, se aportan como abono el valor de **SESENTA Y UN MILLONES NOVECIENTOS MIL NOVECIENTOS SESENTA Y TRES PESOS (\$61.900.963)**

**QUINTO:** Por lo expresado anteriormente, me permito presentar liquidación de crédito actualizada.

**SEXTO:** Solicito muy comedidamente, se decrete el embargo y secuestro de la motocicleta AKT, con placas **EHP66B**, de la secretaria de Transito de Envigado de propiedad de la señora **ADRIANA MARIA BEDOYA SEPÚLVEDA**.

Atentamente,



**ANDRES ALBEIRO GALVIS ARANGO**

C.C 8.433.796 de Itagüí

T.P No. 155.255 del C.S.J



**JUZGADO  
LIQUIDACIÓN DE CRÉDITO  
MEDELLIN**

Plazo TEA pactada, a mensual >>>		Plazo Hasta		01-mar-99
Tasa mensual pactada >>>				14-mar-99
Resultado tasa pactada o pedida >>>	Máxima			01-ene-07
		Mora Hasta (Hoy)	30-sep-21	04-ene-07
Tasa mensual pactada >>>			19/02/2019	
Resultado tasa pactada o pedida >>>	Máxima		Consumo	
		Saldo de capital, Fol. >>	Microc u Otros	
		Intereses en sentencia o liquidación anterior, Fol. >>		

Vigencia		Brio. Cte.	Máxima Mensual	Tasa	Inserte en esta columna	LIQUIDACIÓN DE CRÉDITO						
Desde	Hasta	Efec. Anual	Autorizada	Aplicable	capitales, cuotas u otros	Capital Liquidable	días	Liq Intereses	Abonos		Saldo de Intereses	Saldo de Capital más Intereses
07-sep-12	30-sep-12		1.5			0.00		0.00	Valor	Folio	0.00	0.00
07-sep-12	30-sep-12	20.86%	2.29%	2.295%	55,000,000.00	55,000,000.00	24	1,009,616.63			1,009,616.63	56,009,616.63
01-oct-12	31-oct-12	20.89%	2.30%	2.298%		55,000,000.00	30	1,263,627.53			2,273,244.16	57,273,244.16
01-nov-12	30-nov-12	20.89%	2.30%	2.298%		55,000,000.00	30	1,263,627.53			3,536,871.69	58,536,871.69
01-dic-12	31-dic-12	20.89%	2.30%	2.298%		55,000,000.00	30	1,263,627.53			4,800,499.23	59,800,499.23
01-ene-13	31-ene-13	20.75%	2.28%	2.284%		55,000,000.00	30	1,256,125.07			6,056,624.30	61,056,624.30
01-feb-13	28-feb-13	20.75%	2.28%	2.284%		55,000,000.00	30	1,256,125.07			7,312,749.37	62,312,749.37
01-mar-13	31-mar-13	20.75%	2.28%	2.284%		55,000,000.00	30	1,256,125.07			8,568,874.44	63,568,874.44
01-abr-13	30-abr-13	20.83%	2.29%	2.292%		55,000,000.00	30	1,260,413.54			9,829,287.97	64,829,287.97
01-may-13	31-may-13	20.83%	2.29%	2.292%		55,000,000.00	30	1,260,413.54			11,089,701.51	66,089,701.51
01-jun-13	30-jun-13	20.83%	2.29%	2.292%		55,000,000.00	30	1,260,413.54			12,350,115.05	67,350,115.05
01-jul-13	31-jul-13	20.34%	2.24%	2.244%		55,000,000.00	30	1,234,090.04			13,584,205.10	68,584,205.10
01-ago-13	31-ago-13	20.34%	2.24%	2.244%		55,000,000.00	30	1,234,090.04			14,818,295.14	69,818,295.14
01-sep-13	30-sep-13	20.34%	2.24%	2.244%		55,000,000.00	30	1,234,090.04			16,052,385.18	71,052,385.18
01-oct-13	31-oct-13	19.85%	2.20%	2.196%		55,000,000.00	30	1,207,630.30			17,260,015.49	72,260,015.49
01-nov-13	30-nov-13	19.85%	2.20%	2.196%		55,000,000.00	30	1,207,630.30			18,467,645.79	73,467,645.79
01-dic-13	31-dic-13	19.85%	2.20%	2.196%		55,000,000.00	30	1,207,630.30			19,675,276.09	74,675,276.09
01-ene-14	31-ene-14	19.65%	2.18%	2.176%		55,000,000.00	30	1,196,790.91			20,872,067.01	75,872,067.01
01-feb-14	28-feb-14	19.65%	2.18%	2.176%		55,000,000.00	30	1,196,790.91			22,068,857.92	77,068,857.92
01-mar-14	31-mar-14	19.65%	2.18%	2.176%		55,000,000.00	30	1,196,790.91			23,265,648.84	78,265,648.84
01-abr-14	30-abr-14	19.63%	2.17%	2.174%		55,000,000.00	30	1,195,705.71			24,461,354.55	79,461,354.55
01-may-14	31-may-14	19.63%	2.17%	2.174%		55,000,000.00	30	1,195,705.71			25,657,060.25	80,657,060.25
01-jun-14	30-jun-14	19.63%	2.17%	2.174%		55,000,000.00	30	1,195,705.71			26,852,765.96	81,852,765.96
01-jul-14	31-jul-14	19.33%	2.14%	2.144%		55,000,000.00	30	1,179,399.91			28,032,165.87	83,032,165.87
01-ago-14	31-ago-14	19.33%	2.14%	2.144%		55,000,000.00	30	1,179,399.91			29,211,565.78	84,211,565.78
01-sep-14	29-sep-14	19.33%	2.14%	2.144%		55,000,000.00	29	1,140,086.58			30,351,652.36	85,351,652.36
30-sep-14	30-sep-14	19.33%	2.14%	2.144%		55,000,000.00	1	39,313.33	61,900,963.00		(31,509,997.31)	23,490,002.69
01-oct-14	31-oct-14	19.17%	2.13%	2.129%		23,490,002.69	30	499,987.76			499,987.76	23,989,990.46
01-nov-14	30-nov-14	19.17%	2.13%	2.129%		23,490,002.69	30	499,987.76			999,975.52	24,489,978.22
01-dic-14	31-dic-14	19.17%	2.13%	2.129%		23,490,002.69	30	499,987.76			1,499,963.28	24,989,965.98
01-ene-15	31-ene-15	19.21%	2.13%	2.132%		23,490,002.69	30	500,919.18			2,000,882.46	25,490,885.16
01-feb-15	28-feb-15	19.21%	2.13%	2.132%		23,490,002.69	30	500,919.18			2,501,801.64	25,991,804.33
01-mar-15	31-mar-15	19.21%	2.13%	2.132%		23,490,002.69	30	500,919.18			3,002,720.81	26,492,723.51
01-abr-15	30-abr-15	19.37%	2.15%	2.148%		23,490,002.69	30	504,640.86			3,507,361.68	26,997,364.37
01-may-15	31-may-15	19.37%	2.15%	2.148%		23,490,002.69	30	504,640.86			4,012,002.54	27,502,005.24
01-jun-15	30-jun-15	19.37%	2.15%	2.148%		23,490,002.69	30	504,640.86			4,516,643.41	28,006,646.10
01-jul-15	31-jul-15	19.26%	2.14%	2.137%		23,490,002.69	30	502,082.89			5,018,726.29	28,508,728.99
01-ago-15	31-ago-15	19.26%	2.14%	2.137%		23,490,002.69	30	502,082.89			5,520,809.18	29,010,811.87
01-sep-15	30-sep-15	19.26%	2.14%	2.137%		23,490,002.69	30	502,082.89			6,022,892.07	29,512,894.76
01-oct-15	31-oct-15	19.33%	2.14%	2.144%		23,490,002.69	30	503,711.04			6,526,603.10	30,016,605.80
01-nov-15	30-nov-15	19.33%	2.14%	2.144%		23,490,002.69	30	503,711.04			7,030,314.14	30,520,316.84
01-dic-15	31-dic-15	19.33%	2.14%	2.144%		23,490,002.69	30	503,711.04			7,534,025.18	31,024,027.87
01-ene-16	31-ene-16	19.68%	2.18%	2.179%		23,490,002.69	30	511,833.62			8,045,858.79	31,535,886.49
01-feb-16	29-feb-16	19.68%	2.18%	2.179%		23,490,002.69	30	511,833.62			8,557,692.41	32,047,720.11
01-mar-16	31-mar-16	19.68%	2.18%	2.179%		23,490,002.69	30	511,833.62			9,069,526.02	32,559,553.73
01-abr-16	30-abr-16	20.54%	2.26%	2.263%		23,490,002.69	30	531,664.48			9,601,190.50	33,091,193.20
01-may-16	31-may-16	20.54%	2.26%	2.263%		23,490,002.69	30	531,664.48			10,132,854.98	33,622,857.68

01-jun-16	30-jun-16	20.54%	2.26%	2.263%	23,490,002.69	30	531,664.48	10,664,519.46	34,154,522.15	
01-jul-16	31-jul-16	21.34%	2.34%	2.341%	23,490,002.69	30	549,951.50	11,214,470.96	34,704,473.65	
01-ago-16	31-ago-16	21.34%	2.34%	2.341%	23,490,002.69	30	549,951.50	11,764,422.46	35,254,425.16	
01-sep-16	30-sep-16	21.34%	2.34%	2.341%	23,490,002.69	30	549,951.50	12,314,373.96	35,804,376.66	
01-oct-16	31-oct-16	21.99%	2.40%	2.404%	23,490,002.69	30	564,697.85	12,879,071.81	36,369,074.50	
01-nov-16	30-nov-16	21.99%	2.40%	2.404%	23,490,002.69	30	564,697.85	13,443,769.66	36,933,772.35	
01-dic-16	31-dic-16	21.99%	2.40%	2.404%	23,490,002.69	30	564,697.85	14,008,467.51	37,498,470.20	
01-ene-17	31-ene-17	22.34%	2.44%	2.438%	23,490,002.69	30	572,597.19	14,581,064.69	38,071,067.39	
01-feb-17	28-feb-17	22.34%	2.44%	2.438%	23,490,002.69	30	572,597.19	15,153,661.88	38,643,664.58	
01-mar-17	31-mar-17	22.34%	2.44%	2.438%	23,490,002.69	30	572,597.19	15,726,259.07	39,216,261.76	
01-abr-17	30-abr-17	22.33%	2.44%	2.437%	23,490,002.69	30	572,371.89	16,298,630.96	39,788,633.65	
01-may-17	31-may-17	22.33%	2.44%	2.437%	23,490,002.69	30	572,371.89	16,871,002.85	40,361,005.54	
01-jun-17	30-jun-17	22.33%	2.44%	2.437%	23,490,002.69	30	572,371.89	17,443,374.73	40,933,377.43	
01-jul-17	31-jul-17	21.98%	2.40%	2.403%	23,490,002.69	30	564,471.73	18,007,846.47	41,497,849.16	
01-ago-17	31-ago-17	21.98%	2.40%	2.403%	23,490,002.69	30	564,471.73	18,572,318.20	42,062,320.89	
01-sep-17	30-sep-17	21.98%	2.40%	2.403%	23,490,002.69	30	564,471.73	19,136,789.93	42,626,792.63	
01-oct-17	31-oct-17	21.15%	2.32%	2.323%	23,490,002.69	30	545,622.17	19,682,412.11	43,172,414.80	
01-nov-17	30-nov-17	21.15%	2.32%	2.323%	23,490,002.69	30	545,622.17	20,228,034.28	43,718,036.97	
01-dic-17	31-dic-17	21.15%	2.32%	2.323%	23,490,002.69	30	545,622.17	20,773,656.45	44,263,659.14	
01-ene-18	31-ene-18	20.69%	2.28%	2.278%	23,490,002.69	30	535,104.98	21,308,761.43	44,798,764.12	
01-feb-18	28-feb-18	20.69%	2.28%	2.278%	23,490,002.69	30	535,104.98	21,843,866.40	45,333,869.10	
01-mar-18	31-mar-18	20.69%	2.28%	2.278%	23,490,002.69	30	535,104.98	22,378,971.38	45,868,974.07	
01-abr-18	30-abr-18	20.48%	2.26%	2.257%	23,490,002.69	30	530,286.76	22,909,258.14	46,399,260.83	
01-may-18	31-may-18	20.48%	2.26%	2.257%	23,490,002.69	30	530,286.76	23,439,544.90	46,929,547.59	
01-jun-18	30-jun-18	20.48%	2.26%	2.257%	23,490,002.69	30	530,286.76	23,969,831.66	47,459,834.35	
01-jul-18	31-jul-18	20.03%	2.21%	2.213%	23,490,002.69	30	519,926.07	24,489,757.73	47,979,760.42	
01-ago-18	31-ago-18	20.03%	2.21%	2.213%	23,490,002.69	30	519,926.07	25,009,683.80	48,499,686.49	
01-sep-18	30-sep-18	20.03%	2.21%	2.213%	23,490,002.69	30	519,926.07	25,529,609.86	49,019,612.56	
01-oct-18	31-oct-18	19.63%	2.17%	2.174%	23,490,002.69	30	510,675.10	26,040,284.96	49,530,287.65	
01-nov-18	30-nov-18	19.63%	2.17%	2.174%	23,490,002.69	30	510,675.10	26,550,960.06	50,040,962.75	
01-dic-18	31-dic-18	19.63%	2.17%	2.174%	23,490,002.69	30	510,675.10	27,061,635.15	50,551,637.85	
01-ene-19	31-ene-19	19.16%	2.13%	2.128%	23,490,002.69	30	499,754.85	27,561,390.00	51,051,392.69	
01-feb-19	28-feb-19	19.16%	2.13%	2.128%	23,490,002.69	30	499,754.85	28,061,144.85	51,551,147.54	
01-mar-19	31-mar-19	19.16%	2.13%	2.128%	23,490,002.69	30	499,754.85	28,560,899.69	52,050,902.39	
01-abr-19	30-abr-19	19.32%	2.14%	2.143%	23,490,002.69	30	503,478.52	29,064,378.21	52,554,380.90	
01-may-19	31-may-19	19.32%	2.14%	2.143%	23,490,002.69	30	503,478.52	29,567,856.73	53,057,859.42	
01-jun-19	30-jun-19	19.32%	2.14%	2.143%	23,490,002.69	30	503,478.52	30,071,335.25	53,561,337.94	
01-jul-19	31-jul-19	19.28%	2.14%	2.139%	23,490,002.69	30	502,548.20	30,573,883.44	54,063,886.14	
01-ago-19	31-ago-19	19.28%	2.14%	2.139%	23,490,002.69	30	502,548.20	31,076,431.64	54,566,434.33	
01-sep-19	30-sep-19	19.28%	2.14%	2.139%	23,490,002.69	30	502,548.20	31,578,979.84	55,068,982.53	
01-oct-19	31-oct-19	19.10%	2.12%	2.122%	23,490,002.69	30	498,356.83	32,077,336.67	55,567,339.36	
01-nov-19	30-nov-19	19.10%	2.12%	2.122%	23,490,002.69	30	498,356.83	32,575,693.49	56,065,696.19	
01-dic-19	31-dic-19	19.10%	2.12%	2.122%	23,490,002.69	30	498,356.83	33,074,050.32	56,564,053.01	
01-ene-20	31-ene-20	18.77%	2.09%	2.089%	23,490,002.69	30	490,651.67	33,564,701.99	57,054,704.68	
01-feb-20	29-feb-20	19.06%	2.12%	2.118%	23,490,002.69	30	497,424.32	34,062,126.30	57,552,129.00	
01-mar-20	31-mar-20	18.95%	2.11%	2.107%	23,490,002.69	30	494,857.86	34,556,984.16	58,046,986.85	
01-abr-20	30-abr-20	18.69%	2.08%	2.081%	23,490,002.69	30	488,779.64	35,045,763.80	58,535,766.49	
01-may-20	31-may-20	18.19%	2.03%	2.031%	23,490,002.69	30	477,042.91	35,522,806.70	59,012,809.40	
01-jun-20	30-jun-20	18.12%	2.02%	2.024%	23,490,002.69	30	475,394.71	35,998,201.41	59,488,204.10	
01-jul-20	31-jul-20	18.12%	2.02%	2.024%	23,490,002.69	30	475,394.71	36,473,596.12	59,963,598.81	
01-ago-20	31-ago-20	18.29%	2.04%	2.041%	23,490,002.69	30	479,395.31	36,952,991.43	60,442,994.12	
01-sep-20	30-sep-20	18.35%	2.05%	2.047%	23,490,002.69	30	480,805.54	37,433,796.97	60,923,799.67	
01-oct-20	31-oct-20	18.09%	2.02%	2.021%	23,490,002.69	30	474,687.95	37,908,484.93	61,398,487.62	
01-nov-20	30-nov-20	17.84%	2.00%	1.996%	23,490,002.69	30	468,789.41	38,377,274.34	61,867,277.03	
01-dic-20	31-dic-20	17.46%	1.96%	1.957%	23,490,002.69	30	459,792.92	38,837,067.26	62,327,069.96	
01-ene-21	31-ene-21	17.32%	1.94%	1.943%	23,490,002.69	30	456,469.04	39,293,536.30	62,783,538.99	
01-feb-21	28-feb-21	17.54%	1.97%	1.965%	23,490,002.69	30	461,690.01	39,755,226.31	63,245,229.01	
01-mar-21	31-mar-21	17.41%	1.95%	1.952%	23,490,002.69	30	458,606.40	40,213,832.72	63,703,835.41	
01-abr-21	30-abr-21	17.31%	1.94%	1.942%	23,490,002.69	30	456,231.42	40,670,064.14	64,160,066.83	
01-may-21	31-may-21	17.22%	1.93%	1.933%	23,490,002.69	30	454,091.72	41,124,155.86	64,614,158.55	
01-jun-21	30-jun-21	17.21%	1.93%	1.932%	23,490,002.69	30	453,853.85	41,578,009.71	65,068,012.40	
01-jul-21	31-jul-21	17.18%	1.93%	1.929%	23,490,002.69	30	453,140.07	42,031,149.77	65,521,152.47	
01-ago-21	31-ago-21	17.24%	1.94%	1.935%	23,490,002.69	30	454,567.39	42,485,717.16	65,975,719.86	
01-sep-21	30-sep-21	17.24%	1.94%	1.935%	23,490,002.69	30	454,567.39	42,940,284.55	66,430,287.25	
Resultados >>								61,900,963.00	42,940,284.55	66,430,287.25

SALDO DE CAPITAL	23,490,002.69
SALDO DE INTERESES	42,940,284.56
<b>TOTAL CAPITAL MÁS INTERESES ADEUDADOS</b>	<b>66,430,287.25</b>