

Señor
JUEZ (35) CIVIL MUNICIPAL DE BOGOTÁ D.C.
E. S. D.

RREFERENCIA : **PROCESO EJECUTIVO SINGULAR**
ASUNTO : **OBJECCIÓN LIQUIDACIÓN DEL CREDITO**
DEMANDANTE : **COOPERATIVA FINANCIERA JOHN. F KENNEDY**
DEMANDADO : **CLAUDIA PATRICIA GUERRERO RIVERA**
: **CHRISTIAN ANIBAL MARTINEZ HERRERA**
: **GLADYS ARAMINTA RIVERA TORRES**
: **KENNETH MENDOZA OSORIO**
RADICADO : **2018-00345**

En mi calidad de endosatario al cobro de la entidad demandante dentro del proceso de la referencia, dentro del término de ley, de conformidad al artículo 446 del C.G.P, me dirijo al señor Juez con el fin interponer **OBJECCIÓN** a la liquidación de crédito presentada por la demandada **CLAUDIA PATRICIA GUERRERO RIVERA**, en tanto en ella se incurrió en los siguientes errores:

1. En la liquidación del crédito aportada por la demandada, se procedió a liquidar los intereses moratorios desde el 14 de diciembre de 2013 y así consecutivamente los días **14** de cada mes, **siendo lo correcto, los días 15 de cada mes, a partir del 15 de diciembre de 2013.**
2. En la liquidación del crédito aportada por la demandada, **para la fecha 14 de abril 2015 se incluyó la suma de \$312.204, suma que no corresponde a la cuota de dicha mensualidad,** pues para esa fecha la suma de capital adeudada era \$258.354.
3. En la liquidación del crédito aportada por la demandada, **se omitió incluir la cuota del capital adeudado para el mes de abril de 2016, que asciende a la suma de \$322.424.**

Como fundamento de la objeción propuesta me permito allegar una nueva liquidación, realizada conforme al mandamiento de pago, que asciende a la suma de **TREINTA MILLONES SETECIENTOS CUARENTA Y CINCO MIL SETECIENTOS VENTITRES PESOS CON DIEZ CVS (30.745.723,10).**

Anexos: Liquidación de crédito.

Atentamente,



PAULA ANDREA BEDOYA CARDONA
C.C No 43.639.171 de Medellín.
T.P. No 114.733 del C. S de la Judicatura.



LIQUIDACIÓN DE CRÉDITO
JUZGADO 35 CIVIL MUNICIPAL DE BOGOTÁ D.C.

Plazo TEA pactada, a mensual >>>

Tasa mensual pactada >>>

Resultado tasa pactada o pedida >>

Mora TEA pactada, a mensual >>>

Tasa mensual pactada >>>

Resultado tasa pactada o pedida >>

Plazo Hasta		1-mar-99
Máxima		14-mar-99
Mora Hasta (Hoy)	31-ene-21	1-ene-07
Comercial		4-ene-07
Consumo	X	
Microc u Otros		

RADICADO:

201800345

Pagaré Nro.0404255

Saldo de capital, Fol. >>	
Intereses en sentencia o liquidación anterior, Fol. >>	\$3.992.570,00

Vigencia		Brio. Cte.	Máxima Mensual Autorizada	Tasa Aplicable	Inserte en esta columna capitales, cuotas u otros	LIQUIDACIÓN DE CRÉDITO						
Desde	Hasta	Efec. Anual				Capital Liquidable	días	Intereses en esta Liquidación	Abonos		Saldo de Intereses	Saldo de Capital más Intereses
									Valor	Folio		
15-dic-13	31-dic-13		1,5			0,00					3.992.570,00	3.992.570,00
15-dic-13	31-dic-13	19,85%	2,20%	2,196%	\$ 200.724,00	200.724,00	16	2.350,55			3.994.920,55	4.195.644,55
1-ene-14	14-ene-14	19,65%	2,18%	2,176%		200.724,00	14	2.038,27			3.996.958,82	4.197.682,82
15-ene-14	31-ene-14	19,65%	2,18%	2,176%	\$ 203.934,00	404.658,00	16	4.696,16			4.001.654,97	4.406.312,97
1-feb-14	14-feb-14	19,65%	2,18%	2,176%		404.658,00	14	4.109,14			4.005.764,11	4.410.422,11
15-feb-14	28-feb-14	19,65%	2,18%	2,176%	\$ 207.174,00	611.832,00	16	7.100,46			4.012.864,57	4.624.696,57
1-mar-14	14-mar-14	19,65%	2,18%	2,176%		611.832,00	14	6.212,90			4.019.077,47	4.630.909,47
15-mar-14	31-mar-14	19,65%	2,18%	2,176%	\$ 210.474,00	822.306,00	16	9.543,06			4.028.620,54	4.850.926,54
1-abr-14	14-abr-14	19,63%	2,17%	2,174%		822.306,00	14	8.342,61			4.036.963,14	4.859.269,14
15-abr-14	30-abr-14	19,63%	2,17%	2,174%	\$ 213.804,00	1.036.110,00	16	12.013,41			4.048.976,55	5.085.086,55
1-may-14	14-may-14	19,63%	2,17%	2,174%		1.036.110,00	14	10.511,73			4.059.488,28	5.095.598,28
15-may-14	31-may-14	19,63%	2,17%	2,174%	\$ 217.194,00	1.253.304,00	16	14.531,71			4.074.020,00	5.327.324,00
1-jun-14	14-jun-14	19,63%	2,17%	2,174%		1.253.304,00	14	12.715,25			4.086.735,24	5.340.039,24
15-jun-14	30-jun-14	19,63%	2,17%	2,174%	\$ 220.674,00	1.473.978,00	16	17.090,37			4.103.825,61	5.577.803,61
1-jul-14	14-jul-14	19,33%	2,14%	2,144%		1.473.978,00	14	14.750,14			4.118.575,75	5.592.553,75
15-jul-14	31-jul-14	19,33%	2,14%	2,144%	\$ 224.184,00	1.698.162,00	16	19.421,21			4.137.996,96	5.836.158,96
1-ago-14	14-ago-14	19,33%	2,14%	2,144%		1.698.162,00	14	16.993,56			4.154.990,51	5.853.152,51
15-ago-14	31-ago-14	19,33%	2,14%	2,144%	\$ 227.724,00	1.925.886,00	16	22.025,60			4.177.016,11	6.102.902,11
1-sep-14	14-sep-14	19,33%	2,14%	2,144%		1.925.886,00	14	19.272,40			4.196.288,51	6.122.174,51
15-sep-14	30-sep-14	19,33%	2,14%	2,144%	\$ 231.354,00	2.157.240,00	16	24.671,50			4.220.960,01	6.378.200,01
1-oct-14	14-oct-14	19,17%	2,13%	2,129%		2.157.240,00	14	21.428,00			4.242.388,01	6.399.628,01
15-oct-14	31-oct-14	19,17%	2,13%	2,129%	\$ 235.044,00	2.392.284,00	16	27.157,37			4.269.545,38	6.661.829,38
1-nov-14	14-nov-14	19,17%	2,13%	2,129%		2.392.284,00	14	23.762,70			4.293.308,08	6.685.592,08
15-nov-14	30-nov-14	19,17%	2,13%	2,129%	\$ 238.764,00	2.631.048,00	16	29.867,84			4.323.175,92	6.954.223,92
1-dic-14	14-dic-14	19,17%	2,13%	2,129%		2.631.048,00	14	26.134,36			4.349.310,28	6.980.358,28
15-dic-14	31-dic-14	19,17%	2,13%	2,129%	\$ 242.574,00	2.873.622,00	16	32.621,56			4.381.931,84	7.255.553,84
1-ene-15	14-ene-15	19,21%	2,13%	2,132%		2.873.622,00	14	28.597,04			4.410.528,88	7.284.150,88
15-ene-15	31-ene-15	19,21%	2,13%	2,132%	\$ 246.414,00	3.120.036,00	16	35.484,85			4.446.013,72	7.566.049,72

1-feb-15	14-feb-15	19,21%	2,13%	2,132%		3.120.036,00	14	31.049,24	4.477.062,96	7.597.098,96
15-feb-15	28-feb-15	19,21%	2,13%	2,132%	\$ 250.344,00	3.370.380,00	16	38.332,06	4.515.395,02	7.885.775,02
1-mar-15	14-mar-15	19,21%	2,13%	2,132%		3.370.380,00	14	33.540,55	4.548.935,58	7.919.315,58
15-mar-15	31-mar-15	19,21%	2,13%	2,132%	\$ 254.334,00	3.624.714,00	16	41.224,66	4.590.160,24	8.214.874,24
1-abr-15	14-abr-15	19,37%	2,15%	2,148%		3.624.714,00	14	36.339,58	4.626.499,81	8.251.213,81
15-abr-15	30-abr-15	19,37%	2,15%	2,148%	\$ 258.354,00	3.883.068,00	16	44.491,09	4.670.990,91	8.554.058,91
1-may-15	14-may-15	19,37%	2,15%	2,148%		3.883.068,00	14	38.929,71	4.709.920,61	8.592.988,61
15-may-15	31-may-15	19,37%	2,15%	2,148%	\$ 262.464,00	4.145.532,00	16	47.498,33	4.757.418,94	8.902.950,94
1-jun-15	14-jun-15	19,37%	2,15%	2,148%		4.145.532,00	14	41.561,04	4.798.979,98	8.944.511,98
15-jun-15	30-jun-15	19,37%	2,15%	2,148%	\$ 266.634,00	4.412.166,00	16	50.553,35	4.849.533,33	9.261.699,33
1-jul-15	14-jul-15	19,26%	2,14%	2,137%		4.412.166,00	14	44.009,96	4.893.543,29	9.305.709,29
15-jul-15	31-jul-15	19,26%	2,14%	2,137%	\$ 270.894,00	4.683.060,00	16	53.385,19	4.946.928,48	9.629.988,48
1-ago-15	14-ago-15	19,26%	2,14%	2,137%		4.683.060,00	14	46.712,04	4.993.640,53	9.676.700,53
15-ago-15	31-ago-15	19,26%	2,14%	2,137%	\$ 275.184,00	4.958.244,00	16	56.522,19	5.050.162,71	10.008.406,71
1-sep-15	14-sep-15	19,26%	2,14%	2,137%		4.958.244,00	14	49.456,92	5.099.619,63	10.057.863,63
15-sep-15	30-sep-15	19,26%	2,14%	2,137%	\$ 279.564,00	5.237.808,00	16	59.709,12	5.159.328,75	10.397.136,75
1-oct-15	14-oct-15	19,33%	2,14%	2,144%		5.237.808,00	14	52.414,90	5.211.743,65	10.449.551,65
15-oct-15	31-oct-15	19,33%	2,14%	2,144%	\$ 284.004,00	5.521.812,00	16	63.150,78	5.274.894,43	10.796.706,43
1-nov-15	14-nov-15	19,33%	2,14%	2,144%		5.521.812,00	14	55.256,94	5.330.151,37	10.851.963,37
15-nov-15	30-nov-15	19,33%	2,14%	2,144%	\$ 288.534,00	5.810.346,00	16	66.450,63	5.396.602,00	11.206.948,00
1-dic-15	14-dic-15	19,33%	2,14%	2,144%		5.810.346,00	14	58.144,30	5.454.746,30	11.265.092,30
15-dic-15	31-dic-15	19,33%	2,14%	2,144%	\$ 293.124,00	6.103.470,00	16	69.802,98	5.524.549,28	11.628.019,28
1-ene-16	14-ene-16	19,68%	2,18%	2,179%		6.103.470,00	14	62.062,51	5.586.611,79	11.690.081,79
15-ene-16	31-ene-16	19,68%	2,18%	2,179%	\$ 297.774,00	6.401.244,00	16	74.389,02	5.661.000,81	12.062.244,81
1-feb-16	14-feb-16	19,68%	2,18%	2,179%		6.401.244,00	14	65.090,39	5.726.091,21	12.127.335,21
15-feb-16	29-feb-16	19,68%	2,18%	2,179%	\$ 302.514,00	6.703.758,00	16	77.904,54	5.803.995,75	12.507.753,75
1-mar-16	14-mar-16	19,68%	2,18%	2,179%		6.703.758,00	14	68.166,48	5.872.162,23	12.575.920,23
15-mar-16	31-mar-16	19,68%	2,18%	2,179%	\$ 307.314,00	7.011.072,00	16	81.475,85	5.953.638,08	12.964.710,08
1-abr-16	14-abr-16	20,54%	2,26%	2,263%		7.011.072,00	14	74.053,53	6.027.691,61	13.038.763,61
15-abr-16	30-abr-16	20,54%	2,26%	2,263%	\$ 312.204,00	7.323.276,00	16	88.401,31	6.116.092,92	13.439.368,92
1-may-16	14-may-16	20,54%	2,26%	2,263%		7.323.276,00	14	77.351,15	6.193.444,07	13.516.720,07
15-may-16	31-may-16	20,54%	2,26%	2,263%	\$ 317.184,00	7.640.460,00	16	92.230,13	6.285.674,20	13.926.134,20
1-jun-16	14-jun-16	20,54%	2,26%	2,263%		7.640.460,00	14	80.701,36	6.366.375,56	14.006.835,56
15-jun-16	30-jun-16	20,54%	2,26%	2,263%	\$ 322.424,00	7.962.884,00	16	96.122,20	6.462.497,76	14.425.381,76
1-jul-16	14-jul-16	21,34%	2,34%	2,341%		7.962.884,00	14	86.999,85	6.549.497,61	14.512.381,61
15-jul-16	31-jul-16	21,34%	2,34%	2,341%	\$ 327.354,00	8.290.238,00	16	103.515,90	6.653.013,50	14.943.251,50
1-ago-16	14-ago-16	21,34%	2,34%	2,341%		8.290.238,00	14	90.576,41	6.743.589,92	15.033.827,92
15-ago-16	31-ago-16	21,34%	2,34%	2,341%	\$ 332.544,00	8.622.782,00	16	107.668,20	6.851.258,12	15.474.040,12
1-sep-16	14-sep-16	21,34%	2,34%	2,341%		8.622.782,00	14	94.209,68	6.945.467,79	15.568.249,79
15-sep-16	30-sep-16	21,34%	2,34%	2,341%	\$ 337.824,00	8.960.606,00	16	111.886,43	7.057.354,23	16.017.960,23
1-oct-16	14-oct-16	21,99%	2,40%	2,404%		8.960.606,00	14	100.525,73	7.157.879,96	16.118.485,96
15-oct-16	31-oct-16	21,99%	2,40%	2,404%	\$ 343.194,00	9.303.800,00	16	119.286,74	7.277.166,69	16.580.966,69
1-nov-16	14-nov-16	21,99%	2,40%	2,404%		9.303.800,00	14	104.375,90	7.381.542,59	16.685.342,59
15-nov-16	30-nov-16	21,99%	2,40%	2,404%	\$ 348.650,00	9.652.450,00	16	123.756,88	7.505.299,47	17.157.749,47

1-dic-16	14-dic-16	21,99%	2,40%	2,404%		9.652.450,00	14	108.287,27	7.613.586,74	17.266.036,74
15-dic-16	31-dic-16	21,99%	2,40%	2,404%	\$ 354.204,00	10.006.654,00	16	128.298,23	7.741.884,97	17.748.538,97
1-ene-17	14-ene-17	22,34%	2,44%	2,438%		10.006.654,00	14	113.831,33	7.855.716,30	17.862.370,30
15-ene-17	31-ene-17	22,34%	2,44%	2,438%	\$ 359.844,00	10.366.498,00	16	134.771,15	7.990.487,46	18.356.985,46
1-feb-17	14-feb-17	22,34%	2,44%	2,438%		10.366.498,00	14	117.924,76	8.108.412,21	18.474.910,21
15-feb-17	28-feb-17	22,34%	2,44%	2,438%	\$ 365.544,00	10.732.042,00	16	139.523,46	8.247.935,67	18.979.977,67
1-mar-17	14-mar-17	22,34%	2,44%	2,438%		10.732.042,00	14	122.083,03	8.370.018,70	19.102.060,70
15-mar-17	31-mar-17	22,34%	2,44%	2,438%	\$ 371.352,00	11.103.394,00	16	144.351,27	8.514.369,97	19.617.763,97
1-abr-17	30-abr-17	22,33%	2,44%	2,437%		11.103.394,00	30	270.552,14	8.784.922,12	19.888.316,12
1-may-17	31-may-17	22,33%	2,44%	2,437%		11.103.394,00	30	270.552,14	9.055.474,26	20.158.868,26
1-jun-17	30-jun-17	22,33%	2,44%	2,437%		11.103.394,00	30	270.552,14	9.326.026,41	20.429.420,41
1-jul-17	31-jul-17	21,98%	2,40%	2,403%		11.103.394,00	30	266.817,85	9.592.844,26	20.696.238,26
1-ago-17	31-ago-17	21,98%	2,40%	2,403%		11.103.394,00	30	266.817,85	9.859.662,11	20.963.056,11
1-sep-17	30-sep-17	21,48%	2,35%	2,355%		11.103.394,00	30	261.459,64	10.121.121,74	21.224.515,74
1-oct-17	31-oct-17	21,15%	2,32%	2,323%		11.103.394,00	30	257.907,93	10.379.029,67	21.482.423,67
1-nov-17	30-nov-17	20,96%	2,30%	2,304%		11.103.394,00	30	255.857,45	10.634.887,13	21.738.281,13
1-dic-17	31-dic-17	20,77%	2,29%	2,286%		11.103.394,00	30	253.802,90	10.888.690,03	21.992.084,03
1-ene-18	31-ene-18	20,69%	2,28%	2,278%		11.103.394,00	30	252.936,60	11.141.626,63	22.245.020,63
1-feb-18	28-feb-18	21,01%	2,31%	2,309%		11.103.394,00	30	256.397,45	11.398.024,07	22.501.418,07
1-mar-18	31-mar-18	20,68%	2,28%	2,277%		11.103.394,00	30	252.828,26	11.650.852,33	22.754.246,33
1-abr-18	30-abr-18	20,48%	2,26%	2,257%		11.103.394,00	30	250.659,10	11.901.511,43	23.004.905,43
1-may-18	31-may-18	20,44%	2,25%	2,254%		11.103.394,00	30	250.224,72	12.151.736,14	23.255.130,14
1-jun-18	30-jun-18	20,28%	2,24%	2,238%		11.103.394,00	30	248.485,36	12.400.221,51	23.503.615,51
1-jul-18	31-jul-18	20,03%	2,21%	2,213%		11.103.394,00	30	245.761,74	12.645.983,25	23.749.377,25
1-ago-18	31-ago-18	19,94%	2,20%	2,205%		11.103.394,00	30	244.779,48	12.890.762,72	23.994.156,72
1-sep-18	30-sep-18	19,81%	2,19%	2,192%		11.103.394,00	30	243.358,99	13.134.121,72	24.237.515,72
1-oct-18	31-oct-18	19,63%	2,17%	2,174%		11.103.394,00	30	241.388,94	13.375.510,66	24.478.904,66
1-nov-18	30-nov-18	19,49%	2,16%	2,160%		11.103.394,00	30	239.854,07	13.615.364,72	24.718.758,72
1-dic-18	31-dic-18	19,40%	2,15%	2,151%		11.103.394,00	30	238.866,16	13.854.230,88	24.957.624,88
1-ene-19	31-ene-19	19,16%	2,13%	2,128%		11.103.394,00	30	236.227,09	14.090.457,97	25.193.851,97
1-feb-19	28-feb-19	19,70%	2,18%	2,181%		11.103.394,00	30	242.155,52	14.332.613,49	25.436.007,49
1-mar-19	31-mar-19	19,37%	2,15%	2,148%		11.103.394,00	30	238.536,64	14.571.150,13	25.674.544,13
1-abr-19	30-abr-19	19,32%	2,14%	2,143%		11.103.394,00	30	237.987,22	14.809.137,34	25.912.531,34
1-may-19	31-may-19	19,34%	2,15%	2,145%		11.103.394,00	30	238.207,02	15.047.344,37	26.150.738,37
1-jun-19	30-jun-19	19,30%	2,14%	2,141%		11.103.394,00	30	237.767,37	15.285.111,73	26.388.505,73
1-jul-19	31-jul-19	19,28%	2,14%	2,139%		11.103.394,00	30	237.547,47	15.522.659,20	26.626.053,20
1-ago-19	31-ago-19	19,32%	2,14%	2,143%		11.103.394,00	30	237.987,22	15.760.646,41	26.864.040,41
1-sep-19	30-sep-19	19,32%	2,14%	2,143%		11.103.394,00	30	237.987,22	15.998.633,63	27.102.027,63
1-oct-19	31-oct-19	19,10%	2,12%	2,122%		11.103.394,00	30	235.566,27	16.234.199,90	27.337.593,90
1-nov-19	30-nov-19	19,03%	2,11%	2,115%		11.103.394,00	30	234.794,77	16.468.994,67	27.572.388,67
1-dic-19	31-dic-19	18,91%	2,10%	2,103%		11.103.394,00	30	233.470,86	16.702.465,52	27.805.859,52
1-ene-20	31-ene-20	18,77%	2,09%	2,089%		11.103.394,00	30	231.924,14	16.934.389,67	28.037.783,67
1-feb-20	29-feb-20	19,06%	2,12%	2,118%		11.103.394,00	30	235.125,48	17.169.515,15	28.272.909,15
1-mar-20	31-mar-20	18,95%	2,11%	2,107%		11.103.394,00	30	233.912,35	17.403.427,50	28.506.821,50

1-abr-20	30-abr-20	18,69%	2,08%	2,081%	11.103.394,00	30	231.039,26	17.634.466,76	28.737.860,76	
1-may-20	31-may-20	18,19%	2,03%	2,031%	11.103.394,00	30	225.491,47	17.859.958,24	28.963.352,24	
1-jun-20	30-jun-20	18,12%	2,02%	2,024%	11.103.394,00	30	224.712,39	18.084.670,63	29.188.064,63	
1-jul-20	31-jul-20	18,12%	2,02%	2,024%	11.103.394,00	30	224.712,39	18.309.383,02	29.412.777,02	
1-ago-20	31-ago-20	18,29%	2,04%	2,041%	11.103.394,00	30	226.603,42	18.535.986,45	29.639.380,45	
1-sep-20	30-sep-20	18,35%	2,05%	2,047%	11.103.394,00	30	227.270,02	18.763.256,47	29.866.650,47	
1-oct-20	31-oct-20	18,09%	2,02%	2,021%	11.103.394,00	30	224.378,32	18.987.634,79	30.091.028,79	
1-nov-20	30-nov-20	17,84%	2,00%	1,996%	11.103.394,00	30	221.590,16	19.209.224,95	30.312.618,95	
1-dic-20	31-dic-20	17,46%	1,96%	1,957%	11.103.394,00	30	217.337,65	19.426.562,60	30.529.956,60	
1-ene-21	31-ene-21	17,32%	1,94%	1,943%	11.103.394,00	30	215.766,50	19.642.329,10	30.745.723,10	
							15.649.759,10	0,00	19.642.329,10	30.745.723,10

SALDO DE CAPITAL	11.103.394,00
SALDO DE INTERESES MORATORIOS	19.642.329,10
TOTAL CAPITAL MÁS INTERESES ADEUDADOS	30.745.723,10