

Señor,
JUEZ DIECISIETE (17) CIVIL MUNICIPAL DE BARRANQUILLA.
E. S. D.

REF.
PROCESO: EJECUTIVO
RAD. 2021-00855.
DEMANDANTE: DATECSA S.A.
DEMANDADOS: INSELSA S.A.S.

ASUNTO: RECURSO DE REPOSICION SUBSIDIO DE APELACION.

MARIO ALEXANDER PEÑA CORTÉS, identificado como aparece al pie de mi firma, actuando en mi calidad de apoderado de la parte demandante dentro del proceso de la referencia, con mi acostumbrado respeto, estando dentro del término legal para el efecto, por medio del presente me permito interponer recurso de reposición y en subsidio de apelación, en contra del auto de fecha 13 de diciembre de 2021, por medio del cual se NIEGA LA ORDEN DE PAGO solicitada con la demanda:

FECHA AUTO: 13 de diciembre de 2021

FECHA DE ESTADO 14 de diciembre de 2021

CONTENIDO: “Estando al despacho la presente demanda para resolver sobre la viabilidad de librar mandamiento ejecutivo, resulta necesario realizar las siguientes precisiones: El artículo 2 de la Resolución 000030 de 2019., establece los requisitos de la factura electrónica. Así mismo los artículos 772, 773 y 774 del Código de Comercio, como también el Decreto 1154 e 2020.

Constatado el expediente, este despacho observa que las facturas electrónicas allegadas como título valor no cumplen con los requisitos contemplados en la ley, en razón que no se observa aceptación de la misma como lo indica la norma a continuación:...”

Motivos de Inconformidad

En primer lugar, su Despacho manifiesta que las facturas electrónicas allegadas con la demanda no cumplen con los requisitos para ser considerados títulos valores por cuanto según su Despacho no se observa la aceptación, sin embargo, se aclara al despacho que las facturas electrónicas deben ser consideradas título valor siempre y cuando cumplan con lo señalado por el 2.2.2.53.1 del Decreto 1349 de 2016 Parágrafo 1º, el cual señala que:

“Las facturas electrónicas como título valor de que trata este capítulo serán las: 1. Emitidas con el cumplimiento de los requisitos establecidos en el Decreto 2242 de 2015, o en la norma que lo modifique o sustituya. 2. Aceptadas conforme a lo dispuesto en el artículo 2.2.2.53.5. del Decreto. 3. Registradas en el registro de facturas”

Bajo este entendido, se puede afirmar que las facturas allegadas como base de ejecución, cumplen con los requisitos señalados por la ley, así:

Las Facturas Electrónicas fueron emitidas en el cumplimiento de los requisitos establecidos por el Decreto 2242 de 2015 Art. 3º:

1. Condiciones de generación:

a) Utilizar el formato electrónico de generación estándar establecido por la DIAN. b) Llevar numeración consecutiva autorizada por la DIAN en las condiciones que esta señale. c) Cumplir los requisitos señalados en el artículo 617 del Estatuto Tributario. .d) Incluir firma digital o electrónica como elemento para garantizar autenticidad e integridad de la factura electrónica desde su expedición hasta su conservación, de acuerdo con la Ley 962 de 2005 en concordancia con la Ley 527 de 1999, el Decreto

2364 de 2012, el Decreto 333 de 2014 y las normas que los modifiquen, adicionen o sustituyan, y de acuerdo con la política de firma que establezca la DIAN. La firma digital o electrónica que se incluya en la factura electrónica como elemento tecnológico para el control fiscal podrá pertenecer: - Al obligado a facturar electrónicamente. - A los sujetos autorizados en su empresa. - Al proveedor tecnológico, en las condiciones que acuerden, cuando sea expresamente autorizado por el obligado a facturar electrónicamente, para este efecto. e) Incluir el Código Único de Factura Electrónica.

Dentro del anterior contexto normativo, en primer lugar, frente a lo manifestado por su Despacho en el auto que deniega el mandamiento de pago, en el sentido que en el cuerpo de los títulos no se indica fecha de recibido, al estar soportada la demanda en facturas electrónicas, evidentemente en los documentos no se encuentra la fecha de recibido, lo que no quiere decir, que no se determine la fecha de radicación de cada una de las facturas, de conformidad con lo regulado en la Ley, con la constancia de la entrega al adquirente/pagador en el formato electrónico de generación o archivo XML, de conformidad con lo dispuesto en el artículo 3° del Decreto 2242 de 2015, al correo electrónico autorizado por el adquirente/pagador, como consta en el certificado de existencia y representación legal.

En tal sentido, se puede determinar que las facturas electrónicas generadas y base de ejecución, fueron remitidas en formato electrónico al correo electrónico gerencia@inselsa.com.co señalado por el adquirente/pagador para recibir facturación electrónica, tal y como consta en los archivos XML de cada una de las facturas que me permito anexar al presente escrito, según los cuales una vez realizada una auditoria interna realizada a la plataforma digital se evidencia que los documentos fueron radicados, abiertos y acusados, con el estado de “aceptado” de conformidad con el inciso 3 del artículo 773 del C de Co., modificado por la Ley 1676 de 2013. De igual forma, la facturación electrónica radicada cuenta con su respectivo acuse de recibido como se evidencia en cada uno de los referidos archivos digitales en formato XML, teniendo en cuenta que, la norma señala que podrá utilizar sus propios medios tecnológicos o los que disponga para este fin, así como el detalle de entrega anexo a cada factura.

Finalmente, frente a lo manifestado en el auto en el sentido que tampoco se precisa si los mismos títulos fueron aceptados de conformidad con los arts. 772 y 687 del C. de Co., en concordancia con el núm. 3 art. 5 del Decreto 3727 de 2009, se hace la expresa claridad que una vez presentada y recibida la factura electrónica de conformidad con el acuse de recibido emitido por el respectivo medio tecnológico usado por mi representada para tales efectos, tal como se evidencia en los archivos XML que me permito aportar como anexos; la sociedad demandada, dentro del término legal, ni fuera de él, objetó o rechazó su contenido, motivo por el cual, se encuentra irrevocablemente aceptada (Inc. 3 del Art. 773 del C. de Co., Modificado por L1676/2013 art. 86), aceptación tácita toda vez que el adquirente/pagador no reclamó en contra de su contenido, bien sea por devolución de la misma y de los documentos de despacho, según el caso, mediante reclamo dirigido al emisor, dentro de los tres (3) días hábiles siguientes a la recepción de la factura electrónica como título valor (Inc. 5 del Art. 2.2.2.53.5. del Decreto 1349 de 2016).

De tal forma señor Juez, en el presente caso se verifican los requisitos que establece el Código de Comercio para los títulos valores, las facturas allegadas contienen una obligación clara, expresa y exigible, y en cuanto a la normatividad especial de éste tipo de factura, especialmente el Decreto 1349 de 2016 para la circulación de la factura electrónica como título valor, se dio cumplimiento con la expedición y entrega electrónica de la factura de conformidad con lo establecido por el artículo 3° del Decreto 2242 de 2015, siendo autorizadas previamente por la DIAN mediante las Resoluciones correspondientes.

Ahora bien, se aclara que evidentemente el artículo 2.2.2.53.3 del Decreto 1154 de 2020 establece que el ámbito de aplicación de dicha norma se circunscribe a las facturas electrónicas de venta como título valor, que sean registradas en el RADIAN **y que tengan vocación de circulación**, y a todos los sujetos involucrados o relacionados con la misma.

A su vez el artículo 2.2.2.53.6 del Decreto 1154 de 2020 señala **que la circulación de la factura electrónica de venta como título valor se hará según la voluntad del emisor o del tenedor legítimo, a través del endoso electrónico**, ya sea en propiedad (con responsabilidad o sin responsabilidad), en procuración o en garantía, según corresponda.

Por su parte el artículo 1° de la Resolución 000015 del 15 de febrero de 2021, señala que **el sistema RADIAN permitirá registrar los eventos de circulación de la factura electrónica de venta como título valor**. En su inciso segundo establece que, en cualquier caso, en el registro de la factura electrónica de venta considerada título valor -RADIAN, se inscribirán las facturas electrónicas consideradas como título valor **que circulen en el territorio nacional**.

En relación con las facturas electrónicas de venta no registradas en el RADIAN, el artículo 31 de la Resolución 000015 de 2021, determina: *“El no registro de la factura electrónica de venta como título valor en el RADIAN no impide su constitución como título valor, siempre que se cumpla con los requisitos que la legislación comercial exige para tal efecto.”*

Teniendo en cuenta lo anterior, se concluye que la Resolución 000015 de 2021 establece que en el registro de la factura electrónica de venta considerada título valor – RADIAN se deberán inscribir las facturas de venta como título valor **que tengan vocación de circulación en el territorio nacional**; es decir, **aquellas que serán endosadas electrónicamente**. En consecuencia, el registro de las facturas electrónicas de venta como título valor en el RADIAN es de obligatorio cumplimiento para aquellas facturas que pretendan circular, **por lo cual las facturas electrónicas que no tengan vocación de circulación podrán seguirse constituyendo como título valor, conforme al Código de Comercio**.

De tal forma que, al revisar las facturas electrónicas aportadas con la demanda, y que son base de la presente demanda, no se encuentran endosadas y no han sido objeto de circulación, razón por la cual para su ejecución no requieren estar inscritas en el RADIAN o en cualquier otra plataforma, ya que el demandante es su acreedor original y/o principal y en tal calidad acude al proceso ejecutivo para lograr el pago de las obligaciones insolutas que cada uno de estos títulos contiene.

Nótese que el artículo 31 de la Resolución 000015 de 2021, señala que el no registro de las facturas electrónicas de venta como título valor no impide su constitución como título valor, siempre y cuando cumplan con la legislación comercial respectiva.

SOLICITUD

Teniendo en cuenta lo anterior, me permito solicitar respetuosamente a su despacho:

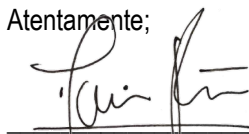
1. Revocar totalmente el auto de fecha 13 de diciembre de 2021, mediante el cual deniega la orden de pago, toda vez que las facturas electrónicas si cumplen con los requisitos para ser título valor, según lo normado por el Decreto 1349 de 2016 y como fue expuesto.
2. Que en su lugar se sirva librar mandamiento de pago y decretar las medidas cautelares.
3. En caso de negativa, se sirva conceder el recurso de alzada.

ANEXO

1. Seis (6) archivos digitales en formato XML correspondientes a cada una de las facturas electrónicas objeto de ejecución.

Del señor Juez,

Atentamente;



MARIO ALEXANDER PEÑA CORTÉS

Cedula de Ciudadanía No.- 79.952.591

T.P. No.- 143.762 del Consejo Superior de la Judicatura

Notificaciones: notificacionjudicialbog@grupoprovicredito.com

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xmlns:qdt="urn:oasis:names:specification:ubl:schema:xsd:QualifiedDatatypes-2" xmlns:sts="dian.gov.co:facturaelectronica:Structures-2-1" xmlns:udt="urn:un:unece:uncefact:data:specification:UnqualifiedDataTypesSchemaModule:2"
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<cac:PartyTaxScheme>
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xmlns:cbc="urn:oasis:names:specification:ubl:schema:xsd:CommonBasicComponents-2"
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xmlns:qdt="urn:oasis:names:specification:ubl:schema:xsd:QualifiedDatatypes-2" xmlns:sts="dian:gov:co:facturaelectronica:Structures-2-1"
xmlns:udt="urn:un:unece:uncefact:data:specification:UnqualifiedDataTypesSchemaModule:2"
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  <cbc:ProfileExecutionID>1</cbc:ProfileExecutionID>
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        <cbc:PostalZone>760002</cbc:PostalZone>
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      </cac:AddressLine>
      <cbc:Country>
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      </cbc:Country>
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  </cac:PhysicalLocation>
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    <cbc:RegistrationName>DATECSA S.A.</cbc:RegistrationName>
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  <cbc:ElectronicMail>facturacionelectronica@datecsa.com</cbc:ElectronicMail>
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  <cac:PartyIdentification>
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  </cac:PartyLegalEntity>
  <cac:Contact>
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    <cbc:ElectronicMail>COMPRAS@INSELSA.COM.CO</cbc:ElectronicMail>
  </cac:Contact>

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<cac:Attachment>
  <cac:ExternalReference>
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xmlns:cbc="urn:oasis:names:specification:ubl:schema:xsd:CommonBasicComponents-2"
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xmlns:qdt="urn:oasis:names:specification:ubl:schema:xsd:QualifiedDatatypes-2" xmlns:sts="dian.gov.co:facturaelectronica:Structures-2-1" xmlns:udt="urn:un:unece:uncefact:data:specification:UnqualifiedDataTypesSchemaModule:2"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:ds="http://www.w3.org/2000/09/xmldsig#"
xmlns="urn:oasis:names:specification:ubl:schema:xsd:Invoice-2">
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listSchemeURI="urn:oasis:names:specification:ubl:odelist:gc:CountryIdentificationCode-2.1">CO</cbc:IdentificationCode>
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  </ext:ExtensionContent>
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      <InteroperabilidadPT>
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    </cac:Response>
  </cac:LineResponse>
</cac:DocumentResponse>
</ApplicationResponse>]]></cbc:Description>
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  </cac:Attachment>
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    <cbc:ValidationTime>11:03:35-05:00</cbc:ValidationTime>
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</cac:DocumentReference>
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</AttachedDocument>

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xmlns:qdt="urn:oasis:names:specification:ubl:schema:xsd:QualifiedDatatypes-2" xmlns:sts="dian:gov:co:facturaelectronica:Structures-2-1"
xmlns:udt="urn:un:unece:uncefact:data:specification:UnqualifiedDataTypesSchemaModule:2"
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  <cbc:ProfileExecutionID>1</cbc:ProfileExecutionID>
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        <cbc:CountrySubentityCode>76</cbc:CountrySubentityCode>
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        </cac:AddressLine>
        <cac:Country>
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    </cac:PhysicalLocation>
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      <cbc:RegistrationName>DATECSA S.A.</cbc:RegistrationName>
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          <cbc:Name languageID="es">Colombia</cbc:Name>
        </cac:Country>
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    </cac:PartyTaxScheme>
    <cac:PartyLegalEntity>
      <cbc:RegistrationName>DATECSA S.A.</cbc:RegistrationName>
      <cbc:CompanyID schemeID="4" schemeName="31" schemeAgencyID="195" schemeAgencyName="CO, DIAN (Dirección de Impuestos y Aduanas Nacionales)">800136505</cbc:CompanyID>

```

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  <cbc:Telephone>6957070</cbc:Telephone>
  <cbc:ElectronicMail>facturacionelectronica@datecsa.com</cbc:ElectronicMail>
</cac:Contact>
</cac:SenderParty>
<cac:ReceiverParty>
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  </cac:PartyName>
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Impuestos y Aduanas Nacionales)">900908859</cbc:CompanyID>
  </cac:PartyLegalEntity>
  <cac:Contact>
    <cbc:Name>INSELSA SAS</cbc:Name>
    <cbc:ElectronicMail>COMPRAS@INSELSA.COM.CO</cbc:ElectronicMail>
  </cac:Contact>

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  <cac:ExternalReference>
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    <cbc:EncodingCode>UTF-8</cbc:EncodingCode>
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xmlns:cbc="urn:oasis:names:specification:ubl:schema:xsd:CommonBasicComponents-2"
xmlns:ext="urn:oasis:names:specification:ubl:schema:xsd:CommonExtensionComponents-2"
xmlns:qdt="urn:oasis:names:specification:ubl:schema:xsd:QualifiedDatatypes-2" xmlns:sts="dian.gov.co:facturaelectronica:Structures-2-1" xmlns:udt="urn:un:unece:uncefact:data:specification:UnqualifiedDataTypesSchemaModule:2"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:ds="http://www.w3.org/2000/09/xmldsig#"
xmlns="urn:oasis:names:specification:ubl:schema:xsd:Invoice-2">
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    <ext:UBLExtension>
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Algorithm="http://www.w3.org/2001/04/xmlenc#sha512"/><ds:DigestValue>SOUtSDz1hpBQlqpsnxuQQKwL19pmEqArM0KYrpbX2Q  
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<cbc:RegistrationName>DATECSA S.A.</cbc:RegistrationName>
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    </cac:LineReference>
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</ApplicationResponse>]]></cbc:Description>
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xmlns:qdt="urn:oasis:names:specification:ubl:schema:xsd:QualifiedDatatypes-2" xmlns:sts="dian:gov:co:facturaelectronica:Structures-2-1"
xmlns:udt="urn:un:unece:uncefact:data:specification:UnqualifiedDataTypesSchemaModule:2"
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    </cac:PhysicalLocation>
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        <cbc:CityName>Cali</cbc:CityName>
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    <cac:TaxScheme>
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    </cac:TaxScheme>
  </cac:PartyTaxScheme>
  <cac:PartyLegalEntity>
    <cbc:RegistrationName>DATECSA S.A.</cbc:RegistrationName>
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```

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  <cbc:Telephone>6957070</cbc:Telephone>
  <cbc:ElectronicMail>facturacionelectronica@datecsa.com</cbc:ElectronicMail>
</cac:Contact>
</cac:SenderParty>
<cac:ReceiverParty>
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    <cbc:RegistrationName>INSELSA SAS</cbc:RegistrationName>
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Impuestos y Aduanas Nacionales)">900908859</cbc:CompanyID>
  </cac:PartyLegalEntity>
  <cac:Contact>
    <cbc:Name>INSELSA SAS</cbc:Name>
    <cbc:ElectronicMail>COMPRAS@INSELSA.COM.CO</cbc:ElectronicMail>
  </cac:Contact>

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xmlns:cbc="urn:oasis:names:specification:ubl:schema:xsd:CommonBasicComponents-2"
xmlns:ext="urn:oasis:names:specification:ubl:schema:xsd:CommonExtensionComponents-2"
xmlns:qdt="urn:oasis:names:specification:ubl:schema:xsd:QualifiedDatatypes-2" xmlns:sts="dian.gov.co:facturaelectronica:Structures-
2-1" xmlns:udt="urn:un:unece:uncefact:data:specification:UnqualifiedDataTypesSchemaModule:2"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:ds="http://www.w3.org/2000/09/xmldsig#"
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