

## MEMORIAL - RADICADO (2019-23)

Felipe Andrés Cristancho Escobar <felipecristanchoescobar@gmail.com>

Vie 28/01/2022 12:48 PM

Para: Juzgado 01 Promiscuo Municipal - Antioquia - Santo Domingo <jprmpalsdomingo@cendoj.ramajudicial.gov.co>

 1 archivos adjuntos (281 KB)

ACTUALIZACIÓN LIQUIDACIÓN DEL CRÉDITO - 2019 23 - HUGO SUAREZ.pdf;

Cordial saludo.

Adjunto encontrará memorial dirigido al proceso con los siguientes datos:

Demandante: Banco Agrario de Colombia S.A.

Demandando: Hugo Alberto Suárez Jaramillo

Radicado 2019-23

Por favor confirmar el recibido de este correo.



Atentamente,

Felipe Cristancho Escobar.



Señor  
**JUEZ PROMISCOU MUNICIPAL DE SANTO DOMINGO – ANTIOQUIA**  
E.S.D.

**Asunto:** ACTUALIZACIÓN LIQUIDACIÓN DEL CRÉDITO  
**Ejecutante:** BANCO AGRARIO DE COLOMBIA S.A.  
**Ejecutado:** HUGO ALBERTO SUAREZ JARAMILLO  
**Radicado:** 2019-23

FELIPE ANDRÉS CRISTANCHO ESCOBAR, identificado como aparece al pie de mi firma, actuando como apoderado de la parte ejecutante, presento, de manera respetuosa, actualización de la liquidación del crédito que trata el artículo 446 del Código General del Proceso, en los siguientes términos:

Al 27 de enero de 2022, el ejecutado adeuda a mi mandante la suma de \$15.669.698=, por los siguientes conceptos:

**1) POR EL PAGARÉ No. 4481860002600044:**

- **Capital:** \$1.549.228=
- **Intereses corrientes:** \$48.976=
- **Otros conceptos:** \$79.200=
- **Intereses de mora:** \$1.553.580=

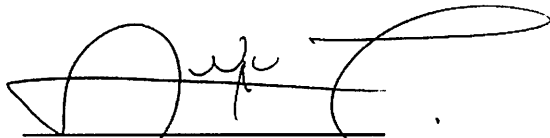
**2) POR EL PAGARÉ No. 014746100003700:**

- **Capital:** \$6.999.237=
- **Intereses corrientes:** \$97.751=
- **Intereses de mora:** \$5.341.726=

**TOTAL: \$15.669.698=**

Muchas gracias por toda la colaboración brindada.

Atentamente,



**Felipe Andrés Cristancho Escobar**  
**CC. 1.020.395.734**  
**T.P. 227.939 del Consejo Superior de la Judicatura**

| TABLA DE LIQUIDACIÓN DE INTERESES DE MORA PAGARÉ NO. 4481860002600044 |           |             |         |           |                    |      |               |
|-----------------------------------------------------------------------|-----------|-------------|---------|-----------|--------------------|------|---------------|
| Desde                                                                 | Hasta     | T. Efectiva | Mensual | Aplicable | Capital Liquidable | Días | Liq Intereses |
| 23-ene-18                                                             | 31-ene-18 | 20,69%      | 2,28%   | 2,278%    | 1.549.228,00       | 8    | 9.411,09      |
| 1-feb-18                                                              | 28-feb-18 | 21,01%      | 2,31%   | 2,309%    | 1.549.228,00       | 30   | 35.774,48     |
| 1-mar-18                                                              | 31-mar-18 | 20,68%      | 2,28%   | 2,277%    | 1.549.228,00       | 30   | 35.276,48     |
| 1-abr-18                                                              | 30-abr-18 | 20,48%      | 2,26%   | 2,257%    | 1.549.228,00       | 30   | 34.973,82     |
| 1-may-18                                                              | 31-may-18 | 20,44%      | 2,25%   | 2,254%    | 1.549.228,00       | 30   | 34.913,21     |
| 1-jun-18                                                              | 30-jun-18 | 20,28%      | 2,24%   | 2,238%    | 1.549.228,00       | 30   | 34.670,52     |
| 1-jul-18                                                              | 31-jul-18 | 20,03%      | 2,21%   | 2,213%    | 1.549.228,00       | 30   | 34.290,50     |
| 1-ago-18                                                              | 31-ago-18 | 19,94%      | 2,20%   | 2,205%    | 1.549.228,00       | 30   | 34.153,45     |
| 1-sep-18                                                              | 30-sep-18 | 19,81%      | 2,19%   | 2,192%    | 1.549.228,00       | 30   | 33.955,25     |
| 1-oct-18                                                              | 31-oct-18 | 19,63%      | 2,17%   | 2,174%    | 1.549.228,00       | 30   | 33.680,38     |
| 1-nov-18                                                              | 30-nov-18 | 19,49%      | 2,16%   | 2,160%    | 1.549.228,00       | 30   | 33.466,22     |
| 1-dic-18                                                              | 31-dic-18 | 19,40%      | 2,15%   | 2,151%    | 1.549.228,00       | 30   | 33.328,38     |
| 1-ene-19                                                              | 31-ene-19 | 19,16%      | 2,13%   | 2,128%    | 1.549.228,00       | 30   | 32.960,16     |
| 1-feb-19                                                              | 28-feb-19 | 19,70%      | 2,18%   | 2,181%    | 1.549.228,00       | 30   | 33.787,34     |
| 1-mar-19                                                              | 31-mar-19 | 19,37%      | 2,15%   | 2,148%    | 1.549.228,00       | 30   | 33.282,40     |
| 1-abr-19                                                              | 30-abr-19 | 19,32%      | 2,14%   | 2,143%    | 1.549.228,00       | 30   | 33.205,74     |
| 1-may-19                                                              | 31-may-19 | 19,34%      | 2,15%   | 2,145%    | 1.549.228,00       | 30   | 33.236,41     |
| 1-jun-19                                                              | 30-jun-19 | 19,30%      | 2,14%   | 2,141%    | 1.549.228,00       | 30   | 33.175,07     |
| 1-jul-19                                                              | 31-jul-19 | 19,28%      | 2,14%   | 2,139%    | 1.549.228,00       | 30   | 33.144,39     |
| 1-ago-19                                                              | 31-ago-19 | 19,32%      | 2,14%   | 2,143%    | 1.549.228,00       | 30   | 33.205,74     |
| 1-sep-19                                                              | 30-sep-19 | 19,32%      | 2,14%   | 2,143%    | 1.549.228,00       | 30   | 33.205,74     |
| 1-oct-19                                                              | 31-oct-19 | 19,10%      | 2,12%   | 2,122%    | 1.549.228,00       | 30   | 32.867,95     |
| 1-nov-19                                                              | 30-nov-19 | 19,03%      | 2,11%   | 2,115%    | 1.549.228,00       | 30   | 32.760,31     |
| 1-dic-19                                                              | 31-dic-19 | 18,91%      | 2,10%   | 2,103%    | 1.549.228,00       | 30   | 32.575,59     |
| 1-ene-20                                                              | 31-ene-20 | 18,77%      | 2,09%   | 2,089%    | 1.549.228,00       | 30   | 32.359,78     |
| 1-feb-20                                                              | 29-feb-20 | 19,06%      | 2,12%   | 2,118%    | 1.549.228,00       | 30   | 32.806,45     |
| 1-mar-20                                                              | 31-mar-20 | 18,95%      | 2,11%   | 2,107%    | 1.549.228,00       | 30   | 32.637,19     |
| 1-abr-20                                                              | 30-abr-20 | 18,69%      | 2,08%   | 2,081%    | 1.549.228,00       | 30   | 32.236,31     |
| 1-may-20                                                              | 31-may-20 | 18,19%      | 2,03%   | 2,031%    | 1.549.228,00       | 30   | 31.462,25     |
| 1-jun-20                                                              | 30-jun-20 | 18,12%      | 2,02%   | 2,024%    | 1.549.228,00       | 30   | 31.353,54     |
| 1-jul-20                                                              | 31-jul-20 | 18,12%      | 2,02%   | 2,024%    | 1.549.228,00       | 30   | 31.353,54     |
| 1-ago-20                                                              | 31-ago-20 | 18,29%      | 2,04%   | 2,041%    | 1.549.228,00       | 30   | 31.617,39     |
| 1-sep-20                                                              | 30-sep-20 | 18,35%      | 2,05%   | 2,047%    | 1.549.228,00       | 30   | 31.710,40     |
| 1-oct-20                                                              | 31-oct-20 | 18,09%      | 2,02%   | 2,021%    | 1.549.228,00       | 30   | 31.306,93     |
| 1-nov-20                                                              | 30-nov-20 | 17,84%      | 2,00%   | 1,996%    | 1.549.228,00       | 30   | 30.917,91     |
| 1-dic-20                                                              | 31-dic-20 | 17,46%      | 1,96%   | 1,957%    | 1.549.228,00       | 30   | 30.324,56     |
| 1-ene-21                                                              | 31-ene-21 | 17,32%      | 1,94%   | 1,943%    | 1.549.228,00       | 30   | 30.105,34     |
| 1-feb-21                                                              | 28-feb-21 | 17,54%      | 1,97%   | 1,965%    | 1.549.228,00       | 30   | 30.449,68     |
| 1-mar-21                                                              | 31-mar-21 | 17,41%      | 1,95%   | 1,952%    | 1.549.228,00       | 30   | 30.246,31     |
| 1-abr-21                                                              | 30-abr-21 | 17,31%      | 1,94%   | 1,942%    | 1.549.228,00       | 30   | 30.089,67     |
| 1-may-21                                                              | 31-may-21 | 17,22%      | 1,93%   | 1,933%    | 1.549.228,00       | 30   | 29.948,55     |
| 1-jun-21                                                              | 30-jun-21 | 17,21%      | 1,93%   | 1,932%    | 1.549.228,00       | 30   | 29.932,87     |
| 1-jul-21                                                              | 31-jul-21 | 17,18%      | 1,93%   | 1,929%    | 1.549.228,00       | 30   | 29.885,79     |
| 1-ago-21                                                              | 31-ago-21 | 17,24%      | 1,94%   | 1,935%    | 1.549.228,00       | 30   | 29.979,93     |
| 1-sep-21                                                              | 30-sep-21 | 17,19%      | 1,93%   | 1,930%    | 1.549.228,00       | 30   | 29.901,48     |
| 1-oct-21                                                              | 31-oct-21 | 17,08%      | 1,92%   | 1,919%    | 1.549.228,00       | 30   | 29.728,76     |
| 1-nov-21                                                              | 30-nov-21 | 17,27%      | 1,94%   | 1,938%    | 1.549.228,00       | 30   | 30.026,97     |
| 1-dic-21                                                              | 31-dic-21 | 17,46%      | 1,96%   | 1,957%    | 1.549.228,00       | 30   | 30.324,56     |
| 1-ene-22                                                              | 27-ene-22 | 17,66%      | 1,98%   | 1,978%    | 1.549.228,00       | 27   | 27.573,44     |
| TOTAL INTERESES MORATORIOS                                            |           |             |         |           |                    |      | \$1.553.580=  |

| TABLA DE LIQUIDACIÓN DE INTERESES DE MORA PAGARÉ NO. 014746100003700 |           |             |         |           |                    |      |                     |
|----------------------------------------------------------------------|-----------|-------------|---------|-----------|--------------------|------|---------------------|
| Desde                                                                | Hasta     | T. Efectiva | Mensual | Aplicable | Capital Liquidable | Días | Liq Intereses       |
| 16-dic-18                                                            | 31-dic-18 | 19,40%      | 2,15%   | 2,151%    | 6.999.237,00       | 15   | 75.286,93           |
| 1-ene-19                                                             | 31-ene-19 | 19,16%      | 2,13%   | 2,128%    | 6.999.237,00       | 30   | 148.910,27          |
| 1-feb-19                                                             | 28-feb-19 | 19,70%      | 2,18%   | 2,181%    | 6.999.237,00       | 30   | 152.647,37          |
| 1-mar-19                                                             | 31-mar-19 | 19,37%      | 2,15%   | 2,148%    | 6.999.237,00       | 30   | 150.366,14          |
| 1-abr-19                                                             | 30-abr-19 | 19,32%      | 2,14%   | 2,143%    | 6.999.237,00       | 30   | 150.019,80          |
| 1-may-19                                                             | 31-may-19 | 19,34%      | 2,15%   | 2,145%    | 6.999.237,00       | 30   | 150.158,36          |
| 1-jun-19                                                             | 30-jun-19 | 19,30%      | 2,14%   | 2,141%    | 6.999.237,00       | 30   | 149.881,21          |
| 1-jul-19                                                             | 31-jul-19 | 19,28%      | 2,14%   | 2,139%    | 6.999.237,00       | 30   | 149.742,59          |
| 1-ago-19                                                             | 31-ago-19 | 19,32%      | 2,14%   | 2,143%    | 6.999.237,00       | 30   | 150.019,80          |
| 1-sep-19                                                             | 30-sep-19 | 19,32%      | 2,14%   | 2,143%    | 6.999.237,00       | 30   | 150.019,80          |
| 1-oct-19                                                             | 31-oct-19 | 19,10%      | 2,12%   | 2,122%    | 6.999.237,00       | 30   | 148.493,71          |
| 1-nov-19                                                             | 30-nov-19 | 19,03%      | 2,11%   | 2,115%    | 6.999.237,00       | 30   | 148.007,38          |
| 1-dic-19                                                             | 31-dic-19 | 18,91%      | 2,10%   | 2,103%    | 6.999.237,00       | 30   | 147.172,83          |
| 1-ene-20                                                             | 31-ene-20 | 18,77%      | 2,09%   | 2,089%    | 6.999.237,00       | 30   | 146.197,82          |
| 1-feb-20                                                             | 29-feb-20 | 19,06%      | 2,12%   | 2,118%    | 6.999.237,00       | 30   | 148.215,85          |
| 1-mar-20                                                             | 31-mar-20 | 18,95%      | 2,11%   | 2,107%    | 6.999.237,00       | 30   | 147.451,13          |
| 1-abr-20                                                             | 30-abr-20 | 18,69%      | 2,08%   | 2,081%    | 6.999.237,00       | 30   | 145.640,02          |
| 1-may-20                                                             | 31-may-20 | 18,19%      | 2,03%   | 2,031%    | 6.999.237,00       | 30   | 142.142,87          |
| 1-jun-20                                                             | 30-jun-20 | 18,12%      | 2,02%   | 2,024%    | 6.999.237,00       | 30   | 141.651,76          |
| 1-jul-20                                                             | 31-jul-20 | 18,12%      | 2,02%   | 2,024%    | 6.999.237,00       | 30   | 141.651,76          |
| 1-ago-20                                                             | 31-ago-20 | 18,29%      | 2,04%   | 2,041%    | 6.999.237,00       | 30   | 142.843,81          |
| 1-sep-20                                                             | 30-sep-20 | 18,35%      | 2,05%   | 2,047%    | 6.999.237,00       | 30   | 143.264,01          |
| 1-oct-20                                                             | 31-oct-20 | 18,09%      | 2,02%   | 2,021%    | 6.999.237,00       | 30   | 141.441,17          |
| 1-nov-20                                                             | 30-nov-20 | 17,84%      | 2,00%   | 1,996%    | 6.999.237,00       | 30   | 139.683,60          |
| 1-dic-20                                                             | 31-dic-20 | 17,46%      | 1,96%   | 1,957%    | 6.999.237,00       | 30   | 137.002,95          |
| 1-ene-21                                                             | 31-ene-21 | 17,32%      | 1,94%   | 1,943%    | 6.999.237,00       | 30   | 136.012,54          |
| 1-feb-21                                                             | 28-feb-21 | 17,54%      | 1,97%   | 1,965%    | 6.999.237,00       | 30   | 137.568,22          |
| 1-mar-21                                                             | 31-mar-21 | 17,41%      | 1,95%   | 1,952%    | 6.999.237,00       | 30   | 136.649,41          |
| 1-abr-21                                                             | 30-abr-21 | 17,31%      | 1,94%   | 1,942%    | 6.999.237,00       | 30   | 135.941,74          |
| 1-may-21                                                             | 31-may-21 | 17,22%      | 1,93%   | 1,933%    | 6.999.237,00       | 30   | 135.304,18          |
| 1-jun-21                                                             | 30-jun-21 | 17,21%      | 1,93%   | 1,932%    | 6.999.237,00       | 30   | 135.233,30          |
| 1-jul-21                                                             | 31-jul-21 | 17,18%      | 1,93%   | 1,929%    | 6.999.237,00       | 30   | 135.020,62          |
| 1-ago-21                                                             | 31-ago-21 | 17,24%      | 1,94%   | 1,935%    | 6.999.237,00       | 30   | 135.445,91          |
| 1-sep-21                                                             | 30-sep-21 | 17,19%      | 1,93%   | 1,930%    | 6.999.237,00       | 30   | 135.091,52          |
| 1-oct-21                                                             | 31-oct-21 | 17,08%      | 1,92%   | 1,919%    | 6.999.237,00       | 30   | 134.311,17          |
| 1-nov-21                                                             | 30-nov-21 | 17,27%      | 1,94%   | 1,938%    | 6.999.237,00       | 30   | 135.658,46          |
| 1-dic-21                                                             | 31-dic-21 | 17,46%      | 1,96%   | 1,957%    | 6.999.237,00       | 30   | 137.002,95          |
| 1-ene-22                                                             | 27-ene-22 | 17,66%      | 1,98%   | 1,978%    | 6.999.237,00       | 27   | 124.573,68          |
| <b>TOTAL INTERESES MORATORIOS</b>                                    |           |             |         |           |                    |      | <b>\$5.341.726=</b> |