

## MEMORIALES - RADICADO (2021-133)

Felipe Andrés Cristancho Escobar <felipecristanchoescobar@gmail.com>

Lun 23/05/2022 13:51

Para: Juzgado 01 Promiscuo Municipal - Antioquia - Sonsón

<j01prMunicipalsonson@cendoj.ramajudicial.gov.co>

Cordial saludo.

En el archivo adjunto encontrarán un memorial dirigido al siguiente proceso:

Demandante: Banco Agrario de Colombia S.A.

Demandado: Eberardo de Jesús Orozco y otro

Radicado: 2021-133

Por favor confirmar la recepción de este correo.

Atentamente,

Felipe Cristancho

Señor

**JUEZ PRIMERO PROMISCO MUNICIPAL DE SONSON – ANTIOQUIA**  
E.S.D.

**Asunto:** ACTUALIZACIÓN LIQUIDACIÓN DEL CRÉDITO  
**Ejecutante:** BANCO AGRARIO DE COLOMBIA S.A.  
**Ejecutado:** EBERARDO DE JESÚS OROZCO MARTÍNEZ Y OTRO  
**Radicado:** 2021 00133

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 30 de abril de 2022, el ejecutado adeuda a mi mandante la suma de \$30.971.908=, por los siguientes conceptos:

**1) POR EL PAGARÉ No. 013466100007887:**

- **Capital:** \$2.499.849=
- **Intereses corrientes:** \$227.490=
- **Otros conceptos:** \$175.867=
- **Intereses de mora:** \$838.223=

**2) POR EL PAGARÉ No. 4481860003609788:**

- **Capital:** \$4.999.974=
- **Intereses corrientes:** \$90.014=
- **Otros conceptos:** \$86.674=
- **Intereses de mora:** \$2.725.600=

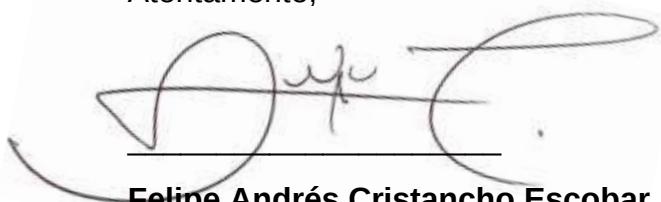
**3) POR EL PAGARÉ No. 013466110000068:**

- **Capital:** \$12.499.965=
- **Intereses corrientes:** \$1.632.069=
- **Intereses de mora:** \$5.196.183=

**TOTAL: \$30.971.908=**

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.013466100007887 |           |             |         |           |                    |      |               |
|---------------------------------------------------------------------|-----------|-------------|---------|-----------|--------------------|------|---------------|
| Desde                                                               | Hasta     | T. Efectiva | Mensual | Aplicable | Capital Liquidable | Días | Liq Intereses |
| 29-nov-20                                                           | 30-nov-20 | 17.84%      | 2.00%   | 1.996%    | 2,499,849.00       | 2    | 3,325.96      |
| 1-dic-20                                                            | 31-dic-20 | 17.46%      | 1.96%   | 1.957%    | 2,499,849.00       | 30   | 48,932.00     |
| 1-ene-21                                                            | 31-ene-21 | 17.32%      | 1.94%   | 1.943%    | 2,499,849.00       | 30   | 48,578.27     |
| 1-feb-21                                                            | 28-feb-21 | 17.54%      | 1.97%   | 1.965%    | 2,499,849.00       | 30   | 49,133.89     |
| 1-mar-21                                                            | 31-mar-21 | 17.41%      | 1.95%   | 1.952%    | 2,499,849.00       | 30   | 48,805.73     |
| 1-abr-21                                                            | 30-abr-21 | 17.31%      | 1.94%   | 1.942%    | 2,499,849.00       | 30   | 48,552.98     |
| 1-may-21                                                            | 31-may-21 | 17.22%      | 1.93%   | 1.933%    | 2,499,849.00       | 30   | 48,325.27     |
| 1-jun-21                                                            | 30-jun-21 | 17.21%      | 1.93%   | 1.932%    | 2,499,849.00       | 30   | 48,299.96     |
| 1-jul-21                                                            | 31-jul-21 | 17.18%      | 1.93%   | 1.929%    | 2,499,849.00       | 30   | 48,223.99     |
| 1-ago-21                                                            | 31-ago-21 | 17.24%      | 1.94%   | 1.935%    | 2,499,849.00       | 30   | 48,375.89     |
| 1-sep-21                                                            | 30-sep-21 | 17.19%      | 1.93%   | 1.930%    | 2,499,849.00       | 30   | 48,249.32     |
| 1-oct-21                                                            | 31-oct-21 | 17.08%      | 1.92%   | 1.919%    | 2,499,849.00       | 30   | 47,970.61     |
| 1-nov-21                                                            | 30-nov-21 | 17.27%      | 1.94%   | 1.938%    | 2,499,849.00       | 30   | 48,451.80     |
| 1-dic-21                                                            | 31-dic-21 | 17.46%      | 1.96%   | 1.957%    | 2,499,849.00       | 30   | 48,932.00     |
| 1-ene-22                                                            | 31-ene-22 | 17.66%      | 1.98%   | 1.978%    | 2,499,849.00       | 30   | 49,436.40     |
| 1-feb-22                                                            | 28-feb-22 | 18.30%      | 2.04%   | 2.042%    | 2,499,849.00       | 30   | 51,043.15     |
| 1-mar-22                                                            | 31-mar-22 | 18.47%      | 2.06%   | 2.059%    | 2,499,849.00       | 30   | 51,468.07     |
| 1-abr-22                                                            | 30-abr-22 | 18.73%      | 2.08%   | 2.085%    | 2,499,849.00       | 30   | 52,118.12     |
| TOTAL INTERESES MORATORIOS                                          |           |             |         |           |                    |      | \$838.223=    |

| TABLA DE LIQUIDACIÓN DE INTERESES DE MORA PAGARÉ NO.4481860003609788 |           |             |         |           |                    |      |               |
|----------------------------------------------------------------------|-----------|-------------|---------|-----------|--------------------|------|---------------|
| Desde                                                                | Hasta     | T. Efectiva | Mensual | Aplicable | Capital Liquidable | Días | LiQ Intereses |
| 22-ene-20                                                            | 31-ene-20 | 18.77%      | 2.09%   | 2.089%    | 4,999,974.00       | 9    | 31,331.36     |
| 1-feb-20                                                             | 29-feb-20 | 19.06%      | 2.12%   | 2.118%    | 4,999,974.00       | 30   | 105,879.45    |
| 1-mar-20                                                             | 31-mar-20 | 18.95%      | 2.11%   | 2.107%    | 4,999,974.00       | 30   | 105,333.17    |
| 1-abr-20                                                             | 30-abr-20 | 18.69%      | 2.08%   | 2.081%    | 4,999,974.00       | 30   | 104,039.39    |
| 1-may-20                                                             | 31-may-20 | 18.19%      | 2.03%   | 2.031%    | 4,999,974.00       | 30   | 101,541.16    |
| 1-jun-20                                                             | 30-jun-20 | 18.12%      | 2.02%   | 2.024%    | 4,999,974.00       | 30   | 101,190.33    |
| 1-jul-20                                                             | 31-jul-20 | 18.12%      | 2.02%   | 2.024%    | 4,999,974.00       | 30   | 101,190.33    |
| 1-ago-20                                                             | 31-ago-20 | 18.29%      | 2.04%   | 2.041%    | 4,999,974.00       | 30   | 102,041.88    |
| 1-sep-20                                                             | 30-sep-20 | 18.35%      | 2.05%   | 2.047%    | 4,999,974.00       | 30   | 102,342.06    |
| 1-oct-20                                                             | 31-oct-20 | 18.09%      | 2.02%   | 2.021%    | 4,999,974.00       | 30   | 101,039.90    |
| 1-nov-20                                                             | 30-nov-20 | 17.84%      | 2.00%   | 1.996%    | 4,999,974.00       | 30   | 99,784.36     |
| 1-dic-20                                                             | 31-dic-20 | 17.46%      | 1.96%   | 1.957%    | 4,999,974.00       | 30   | 97,869.41     |
| 1-ene-21                                                             | 31-ene-21 | 17.32%      | 1.94%   | 1.943%    | 4,999,974.00       | 30   | 97,161.90     |
| 1-feb-21                                                             | 28-feb-21 | 17.54%      | 1.97%   | 1.965%    | 4,999,974.00       | 30   | 98,273.21     |
| 1-mar-21                                                             | 31-mar-21 | 17.41%      | 1.95%   | 1.952%    | 4,999,974.00       | 30   | 97,616.85     |
| 1-abr-21                                                             | 30-abr-21 | 17.31%      | 1.94%   | 1.942%    | 4,999,974.00       | 30   | 97,111.32     |
| 1-may-21                                                             | 31-may-21 | 17.22%      | 1.93%   | 1.933%    | 4,999,974.00       | 30   | 96,655.88     |
| 1-jun-21                                                             | 30-jun-21 | 17.21%      | 1.93%   | 1.932%    | 4,999,974.00       | 30   | 96,605.24     |
| 1-jul-21                                                             | 31-jul-21 | 17.18%      | 1.93%   | 1.929%    | 4,999,974.00       | 30   | 96,453.31     |
| 1-ago-21                                                             | 31-ago-21 | 17.24%      | 1.94%   | 1.935%    | 4,999,974.00       | 30   | 96,757.13     |
| 1-sep-21                                                             | 30-sep-21 | 17.19%      | 1.93%   | 1.930%    | 4,999,974.00       | 30   | 96,503.96     |
| 1-oct-21                                                             | 31-oct-21 | 17.08%      | 1.92%   | 1.919%    | 4,999,974.00       | 30   | 95,946.51     |
| 1-nov-21                                                             | 30-nov-21 | 17.27%      | 1.94%   | 1.938%    | 4,999,974.00       | 30   | 96,908.96     |
| 1-dic-21                                                             | 31-dic-21 | 17.46%      | 1.96%   | 1.957%    | 4,999,974.00       | 30   | 97,869.41     |
| 1-ene-22                                                             | 31-ene-22 | 17.66%      | 1.98%   | 1.978%    | 4,999,974.00       | 30   | 98,878.26     |
| 1-feb-22                                                             | 28-feb-22 | 18.30%      | 2.04%   | 2.042%    | 4,999,974.00       | 30   | 102,091.93    |
| 1-mar-22                                                             | 31-mar-22 | 18.47%      | 2.06%   | 2.059%    | 4,999,974.00       | 30   | 102,941.82    |
| 1-abr-22                                                             | 30-abr-22 | 18.73%      | 2.08%   | 2.085%    | 4,999,974.00       | 30   | 104,241.99    |
| TOTAL INTERESES MORATORIOS                                           |           |             |         |           |                    |      | \$2,725.600=  |

| TABLA DE LIQUIDACIÓN DE INTERESES DE MORA PAGARÉ NO.013466110000068 |           |             |         |           |                    |      |               |
|---------------------------------------------------------------------|-----------|-------------|---------|-----------|--------------------|------|---------------|
| Desde                                                               | Hasta     | T. Efectiva | Mensual | Aplicable | Capital Liquidable | Días | LiQ Intereses |
| 31-jul-20                                                           | 31-jul-20 | 18.12%      | 2.02%   | 2.024%    | 12,499,965.00      | 1    | 8,432.55      |
| 1-ago-20                                                            | 31-ago-20 | 18.29%      | 2.04%   | 2.041%    | 12,499,965.00      | 30   | 255,105.32    |
| 1-sep-20                                                            | 30-sep-20 | 18.35%      | 2.05%   | 2.047%    | 12,499,965.00      | 30   | 255,855.76    |
| 1-oct-20                                                            | 31-oct-20 | 18.09%      | 2.02%   | 2.021%    | 12,499,965.00      | 30   | 252,600.35    |
| 1-nov-20                                                            | 30-nov-20 | 17.84%      | 2.00%   | 1.996%    | 12,499,965.00      | 30   | 249,461.50    |
| 1-dic-20                                                            | 31-dic-20 | 17.46%      | 1.96%   | 1.957%    | 12,499,965.00      | 30   | 244,674.11    |
| 1-ene-21                                                            | 31-ene-21 | 17.32%      | 1.94%   | 1.943%    | 12,499,965.00      | 30   | 242,905.34    |
| 1-feb-21                                                            | 28-feb-21 | 17.54%      | 1.97%   | 1.965%    | 12,499,965.00      | 30   | 245,683.62    |
| 1-mar-21                                                            | 31-mar-21 | 17.41%      | 1.95%   | 1.952%    | 12,499,965.00      | 30   | 244,042.71    |
| 1-abr-21                                                            | 30-abr-21 | 17.31%      | 1.94%   | 1.942%    | 12,499,965.00      | 30   | 242,778.89    |
| 1-may-21                                                            | 31-may-21 | 17.22%      | 1.93%   | 1.933%    | 12,499,965.00      | 30   | 241,640.27    |
| 1-jun-21                                                            | 30-jun-21 | 17.21%      | 1.93%   | 1.932%    | 12,499,965.00      | 30   | 241,513.69    |
| 1-jul-21                                                            | 31-jul-21 | 17.18%      | 1.93%   | 1.929%    | 12,499,965.00      | 30   | 241,133.86    |
| 1-ago-21                                                            | 31-ago-21 | 17.24%      | 1.94%   | 1.935%    | 12,499,965.00      | 30   | 241,893.39    |
| 1-sep-21                                                            | 30-sep-21 | 17.19%      | 1.93%   | 1.930%    | 12,499,965.00      | 30   | 241,260.48    |
| 1-oct-21                                                            | 31-oct-21 | 17.08%      | 1.92%   | 1.919%    | 12,499,965.00      | 30   | 239,866.86    |
| 1-nov-21                                                            | 30-nov-21 | 17.27%      | 1.94%   | 1.938%    | 12,499,965.00      | 30   | 242,272.98    |
| 1-dic-21                                                            | 31-dic-21 | 17.46%      | 1.96%   | 1.957%    | 12,499,965.00      | 30   | 244,674.11    |
| 1-ene-22                                                            | 31-ene-22 | 17.66%      | 1.98%   | 1.978%    | 12,499,965.00      | 30   | 247,196.25    |
| 1-feb-22                                                            | 28-feb-22 | 18.30%      | 2.04%   | 2.042%    | 12,499,965.00      | 30   | 255,230.43    |
| 1-mar-22                                                            | 31-mar-22 | 18.47%      | 2.06%   | 2.059%    | 12,499,965.00      | 30   | 257,355.18    |
| 1-abr-22                                                            | 30-abr-22 | 18.73%      | 2.08%   | 2.085%    | 12,499,965.00      | 30   | 260,605.59    |
| TOTAL INTERESES MORATORIOS                                          |           |             |         |           |                    |      | \$5,196.183=  |