

2019-27

andres henao <henaoidarraga@yahoo.com>

Vie 21/05/2021 7:35 AM

Para: Juzgado 01 Promiscuo Municipal - Quindio - Genova <jprmpalgenova@cendoj.ramajudicial.gov.co>

1 archivos adjuntos (427 KB)

2019-27 G liquidación JHON MARIN LOTERO.pdf;

Buenos días.

Adjunto memorial dirigido al juzgado y expediente de la referencia.

Cordialmente,

ANDRES HENAO
Apoderado parte demandante.

JUZGADO PROMISCO MUICIPAL
GENOVA QUINDIO
SECRETARÍA

EL ANTERIOR MEMORIAL, ESCRITO O DEVOLUCIÓN DE LA CAUSA EN
LA FECHA: 21 MAY 2021 SIENDO LA FECHA DE RECEPCIÓN

EL SECRETARIO: Olga Lucía Mandanda R

Señor
JUEZ PROMISCOU MUNICIPAL
Génova. Quindío.

Ref: Proceso Ejecutivo N° 2019 - 27
Demandante: BANCO AGRARIO DE COLOMBIA S.A.
Demandado: JHON JAIRO MARIN LOTERO

ANDRES ALEJANDRO HENAO IDARRAGA, mayor, vecino de Armenia.Q.,
Identificado con la Cédula de Ciudadanía N° 89.005.349 expedida en
Armenia.Q., Abogado en ejercicio con Tarjeta Profesional N° 106.826 del
Consejo Superior de la Judicatura, obrando en nombre y representación de
la parte actora dentro del proceso de la referencia, por medio del presente
escrito respetuosamente presento ante su Despacho liquidación del crédito
de la siguiente forma:

CAPITAL \$ 2,691,456							
FECHA inicio liq				CAPITAL 2,691,456.00			
fecha final liq							
Periodo intereses de mora				Int. mora Ef. Anual	Int. Mora tasa Mensual	intereses período	intereses acumulados
dia	mes	año	N° días				
5	4	2018					
30	4	2018	25	30.72	2.56	\$ 57,417.73	\$ 57,417.73
1	5	2018					
31	5	2018	31	30.66	2.555	\$ 71,058.92	\$ 128,476.65
1	6	2018					
30	6	2018	30	30.42	2.535	\$ 68,228.41	\$ 196,705.06
1	7	2018					
31	7	2018	31	30.05	2.50416667	\$ 69,645.16	\$ 266,350.22
1	8	2018					
31	8	2018	31	29.91	2.4925	\$ 69,320.69	\$ 335,670.92
1	9	2018					
30	9	2018	30	29.72	2.47666667	\$ 66,658.39	\$ 402,329.31
1	10	2018					
31	10	2018	31	29.45	2.45416667	\$ 68,254.58	\$ 470,583.89
1	11	2018					
30	11	2018	30	29.24	2.43666667	\$ 65,581.81	\$ 536,165.70

1	12	2018					
31	11	2018	31	29.1	2.425	\$ 67,443.40	\$ 603,609.10
1	1	2019					
31	1	2019	31	28.74	2.395	\$ 66,609.05	\$ 670,218.15
1	2	2019					
28	2	2019	28	29.55	2.4625	\$ 61,858.63	\$ 732,076.78
1	3	2019					
31	3	2019	31	29.06	2.42125	\$ 67,339.11	\$ 799,415.89
1	4	2019					
30	4	2019	30	28.98	2.415	\$ 64,998.66	\$ 864,414.55
1	5	2019					
31	5	2019	31	29.01	2.4175	\$ 67,234.81	\$ 931,649.36
1	6	2019					
30	6	2019	31	28.95	2.4125	\$ 67,095.76	\$ 998,745.12
1	7	2019					
31	7	2019	31	28.92	2.41	\$ 67,026.23	\$ 1,065,771.34
1	8	2019					
31	8	2019	31	28.98	2.415	\$ 67,165.28	\$ 1,132,936.63
1	9	2019					
30	9	2019	30	28.98	2.415	\$ 64,998.66	\$ 1,197,935.29
1	10	2019					
31	10	2019	31	28.98	2.415	\$ 67,165.28	\$ 1,265,100.58
1	11	2019					
30	11	2019	30	28.55	2.37916667	\$ 64,034.22	\$ 1,329,134.80
1	12	2019					
30	12	2019	31	28.37	2.36416667	\$ 65,751.52	\$ 1,394,886.32
1	1	2020					
30	1	2020	30	28.16	2.34666667	\$ 63,159.50	\$ 1,458,045.82
1	2	2020					
29	2	2020	29	28.59	2.3825	\$ 61,986.47	\$ 1,520,032.30
1	3	2020					
31	3	2020	31	28.43	2.36916667	\$ 65,890.58	\$ 1,585,922.88
1	4	2020					
30	4	2020	30	28.04	2.33666667	\$ 62,890.36	\$ 1,648,813.23
1	5	2020					
31	5	2020	31	27.29	2.27416667	\$ 63,248.47	\$ 1,712,061.70
1	6	2020					
30	6	2020	30	27.18	2.265	\$ 60,961.48	\$ 1,773,023.18
1	7	2020					
31	7	2020	31	27.18	2.265	\$ 62,993.53	\$ 1,836,016.71
1	8	2020					
31	8	2020	31	27.44	2.28666667	\$ 63,596.11	\$ 1,899,612.82
1	9	2020					
30	9	2020	30	27.53	2.29416667	\$ 61,746.49	\$ 1,961,359.31
1	10	2020					
31	10	2020	31	27.14	2.26166667	\$ 62,900.82	\$ 2,024,260.13
1	11	2020					
30	11	2020	30	26.76	2.23	\$ 60,019.47	\$ 2,084,279.60
1	12	2020					
31	12	2020	31	26.19	2.1825	\$ 60,699.06	\$ 2,144,978.66
1	1	2021					
31	1	2021	31	25.98	2.165	\$ 60,212.36	\$ 2,205,191.02
1	2	2021					

28	2	2021	28	26.31	2.1925	\$ 55,076.16	\$ 2,260,267.18
1	3	2021					
31	3	2021	31	26.12	2.17666667	\$ 60,536.83	\$ 2,320,804.01
1	4	2021					
30	4	2021	30	25.97	2.16416667	\$ 58,247.59	\$ 2,379,051.60
1	5	2021					
21	5	2021	21	25.83	2.1525	\$ 40,553.51	\$ 2,419,605.11

seguros824891

int corrientes

sub- Total 1\$ 5,935,952.11

CAPITAL \$ 3,897,217

FECHA inicio liq

fecha final liq

CAPITAL3,897,217.00

Periodo intereses de mora				Int. mora Ef. Anual	Int. Mora tasa Mensual	intereses período	intereses acumulados
dia	mes	año	Nº días				
4	9	2018					
30	9	2018	26	29.72	2.47666667	\$ 83,651.60	\$ 83,651.60
1	10	2018					
31	10	2018	31	29.45	2.45416667	\$ 98,832.34	\$ 182,483.94
1	11	2018					
30	11	2018	30	29.24	2.43666667	\$ 94,962.19	\$ 277,446.13
1	12	2018					
31	11	2018	31	29.1	2.425	\$ 97,657.76	\$ 375,103.89
1	1	2019					
31	1	2019	31	28.74	2.395	\$ 96,449.63	\$ 471,553.51
1	2	2019					
28	2	2019	28	29.55	2.4625	\$ 89,571.04	\$ 561,124.55
1	3	2019					
31	3	2019	31	29.06	2.42125	\$ 97,506.75	\$ 658,631.30
1	4	2019					
30	4	2019	30	28.98	2.415	\$ 94,117.79	\$ 752,749.09
1	5	2019					
31	5	2019	31	29.01	2.4175	\$ 97,355.73	\$ 850,104.82
1	6	2019					
30	6	2019	31	28.95	2.4125	\$ 97,154.37	\$ 947,259.19
1	7	2019					
31	7	2019	31	28.92	2.41	\$ 97,053.69	\$ 1,044,312.88
1	8	2019					
31	8	2019	31	28.98	2.415	\$ 97,255.05	\$ 1,141,567.93
1	9	2019					
30	9	2019	30	28.98	2.415	\$ 94,117.79	\$ 1,235,685.72
1	10	2019					
31	10	2019	31	28.98	2.415	\$ 97,255.05	\$ 1,332,940.77
1	11	2019					
30	11	2019	30	28.55	2.37916667	\$ 92,721.29	\$ 1,425,662.06
1	12	2019					
30	12	2019	31	28.37	2.36416667	\$ 95,207.93	\$ 1,520,869.99
1	1	2020					
30	1	2020	30	28.16	2.34666667	\$ 91,454.69	\$ 1,612,324.68
1	2	2020					

29	2	2020	29	28.59	2.3825	\$ 89,756.16	\$ 1,702,080.84
1	3	2020					
31	3	2020	31	28.43	2.36916667	\$ 95,409.28	\$ 1,797,490.12
1	4	2020					
30	4	2020	30	28.04	2.33666667	\$ 91,064.97	\$ 1,888,555.09
1	5	2020					
31	5	2020	31	27.29	2.27416667	\$ 91,583.52	\$ 1,980,138.61
1	6	2020					
30	6	2020	30	27.18	2.265	\$ 88,271.97	\$ 2,068,410.57
1	7	2020					
31	7	2020	31	27.18	2.265	\$ 91,214.36	\$ 2,159,624.94
1	8	2020					
31	8	2020	31	27.44	2.28666667	\$ 92,086.91	\$ 2,251,711.85
1	9	2020					
30	9	2020	30	27.53	2.29416667	\$ 89,408.65	\$ 2,341,120.50
1	10	2020					
31	10	2020	31	27.14	2.26166667	\$ 91,080.13	\$ 2,432,200.63
1	11	2020					
30	11	2020	30	26.76	2.23	\$ 86,907.94	\$ 2,519,108.56
1	12	2020					
31	12	2020	31	26.19	2.1825	\$ 87,891.99	\$ 2,607,000.55
1	1	2021					
31	1	2021	31	25.98	2.165	\$ 87,187.24	\$ 2,694,187.79
1	2	2021					
28	2	2021	28	26.31	2.1925	\$ 79,750.05	\$ 2,773,937.84
1	3	2021					
31	3	2021	31	26.12	2.17666667	\$ 87,657.07	\$ 2,861,594.91
1	4	2021					
30	4	2021	30	25.97	2.16416667	\$ 84,342.27	\$ 2,945,937.18
1	5	2021					
21	5	2021	21	25.83	2.1525	\$ 58,721.32	\$ 3,004,658.50

seguros20239

int corrientes

sub- Total 2\$ 6,922,114.50

CAPITAL \$ 1,258,791

FECHA inicio liq

fecha final liq

CAPITAL1,258,791.00

Periodo intereses de mora				Int. mora Ef. Anual	Int. Mora tasa Mensual	intereses período	intereses acumulados
dia	mes	año	Nº días				
6	10	2018					
31	10	2018	25	29.45	2.45416667	\$ 25,744.02	\$ 25,744.02
1	11	2018					
30	11	2018	30	29.24	2.43666667	\$ 30,672.54	\$ 56,416.56
1	12	2018					
31	11	2018	31	29.1	2.425	\$ 31,543.20	\$ 87,959.77
1	1	2019					
31	1	2019	31	28.74	2.395	\$ 31,152.98	\$ 119,112.75
1	2	2019					
28	2	2019	28	29.55	2.4625	\$ 28,931.21	\$ 148,043.96
1	3	2019					

31	3	2019	31	29.06	2.42125	\$ 31,494.43	\$ 179,538.39
1	4	2019					
30	4	2019	30	28.98	2.415	\$ 30,399.80	\$ 209,938.19
1	5	2019					
31	5	2019	31	29.01	2.4175	\$ 31,445.65	\$ 241,383.84
1	6	2019					
30	6	2019	31	28.95	2.4125	\$ 31,380.61	\$ 272,764.45
1	7	2019					
31	7	2019	31	28.92	2.41	\$ 31,348.09	\$ 304,112.54
1	8	2019					
31	8	2019	31	28.98	2.415	\$ 31,413.13	\$ 335,525.67
1	9	2019					
30	9	2019	30	28.98	2.415	\$ 30,399.80	\$ 365,925.47
1	10	2019					
31	10	2019	31	28.98	2.415	\$ 31,413.13	\$ 397,338.60
1	11	2019					
30	11	2019	30	28.55	2.37916667	\$ 29,948.74	\$ 427,287.34
1	12	2019					
30	12	2019	31	28.37	2.36416667	\$ 30,751.91	\$ 458,039.25
1	1	2020					
30	1	2020	30	28.16	2.34666667	\$ 29,539.63	\$ 487,578.88
1	2	2020					
29	2	2020	29	28.59	2.3825	\$ 28,991.01	\$ 516,569.89
1	3	2020					
31	3	2020	31	28.43	2.36916667	\$ 30,816.95	\$ 547,386.84
1	4	2020					
30	4	2020	30	28.04	2.33666667	\$ 29,413.75	\$ 576,800.59
1	5	2020					
31	5	2020	31	27.29	2.27416667	\$ 29,581.24	\$ 606,381.83
1	6	2020					
30	6	2020	30	27.18	2.265	\$ 28,511.62	\$ 634,893.44
1	7	2020					
31	7	2020	31	27.18	2.265	\$ 29,462.00	\$ 664,355.45
1	8	2020					
31	8	2020	31	27.44	2.28666667	\$ 29,743.83	\$ 694,099.28
1	9	2020					
30	9	2020	30	27.53	2.29416667	\$ 28,878.76	\$ 722,978.04
1	10	2020					
31	10	2020	31	27.14	2.26166667	\$ 29,418.64	\$ 752,396.69
1	11	2020					
30	11	2020	30	26.76	2.23	\$ 28,071.04	\$ 780,467.73
1	12	2020					
31	12	2020	31	26.19	2.1825	\$ 28,388.88	\$ 808,856.61
1	1	2021					
31	1	2021	31	25.98	2.165	\$ 28,161.25	\$ 837,017.87
1	2	2021					
28	2	2021	28	26.31	2.1925	\$ 25,759.06	\$ 862,776.92
1	3	2021					
31	3	2021	31	26.12	2.17666667	\$ 28,313.01	\$ 891,089.93
1	4	2021					
30	4	2021	30	25.97	2.16416667	\$ 27,242.34	\$ 918,332.27
1	5	2021					
21	5	2021	21	25.83	2.1525	\$ 18,966.83	\$ 937,299.10

seguros	313855
int corrientes	
sub- Total 3	\$ 2,509,945.10
	\$
TOTAL	15,368,011.71

Del señor Juez, respetuosamente



ANDRES ALEJANDRO HENAO IDARRAGA

C.C. 89.005.349 Armenia.Q.

T.P. 106.826 C.S.J.