

SEÑOR

JUEZ 11 CIVIL MUNICIPAL DE CALI-VALLE

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E. S. D.

RECIBIDO
30-03-2022 G-Q-

Proceso: **EJECUTIVO SINGULAR**

Demandante: **FONDO NACIONAL DEL AHORRO**

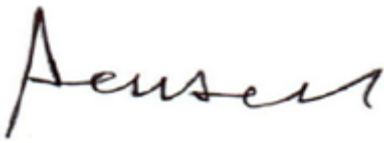
Demandado: **BIBIANA HERNANDEZ MOSQUERA**

Radicación: **202100138**

JAIME SUAREZ ESCAMILLA, obrando como apoderado de la parte demandante en el proceso de la referencia, con el respeto acostumbrado me dirijo al señor juez, por medio del presente escrito y en cumplimiento de lo normado en el artículo 446 del Código General del Proceso, me permito:

1. Adjuntar a este escrito liquidación de crédito por valor de **\$ 19.400.921,00 M/CTE.**

Del Señor Juez, atentamente,



JAIME SUAREZ ESCAMILLA

C.C. No. 19.417.696 de Bogotá

T.P. No. 63.217 del C. S. de la J.

DANIELA LEDEZMA

30/03/2022

Enviado por correo electrónico

30/03/2022

BIBIANA HERNANDEZ MOSQUERA Y DAVID RIVERA OTALVARO

PAGARE No. 31529830

1- LIQUIDACIÓN INTERESES DE MORA CAPITAL ACELERADO

VR CAPITAL ACELERADO			\$ 13.972.457,75		
FECHA		DÍAS	CAPITAL	MORA ANUAL	INTERÉS MORATORIOS
DESDE	HASTA				
22-feb.-21	15-mar.-21	22	\$ 13.972.457,75	18,93%	\$ 149.099,98
16-mar.-21	15-abr.-21	31	\$ 13.972.457,75	18,93%	\$ 210.095,42
16-abr.-21	15-may.-21	30	\$ 13.972.457,75	18,93%	\$ 203.318,15
16-may.-21	15-jun.-21	31	\$ 13.972.457,75	18,93%	\$ 210.095,42
16-jun.-21	15-jul.-21	30	\$ 13.972.457,75	18,93%	\$ 203.318,15
16-jul.-21	15-ago.-21	31	\$ 13.972.457,75	18,93%	\$ 210.095,42
16-ago.-21	15-sep.-21	31	\$ 13.972.457,75	18,93%	\$ 210.095,42
16-sep.-21	15-oct.-21	30	\$ 13.972.457,75	18,93%	\$ 203.318,15
16-oct.-21	15-nov.-21	31	\$ 13.972.457,75	18,93%	\$ 210.095,42
16-nov.-21	15-dic.-21	30	\$ 13.972.457,75	18,93%	\$ 203.318,15
16-dic.-21	15-ene.-22	31	\$ 13.972.457,75	18,93%	\$ 210.095,42
16-ene.-22	15-feb.-22	31	\$ 13.972.457,75	18,93%	\$ 210.095,42
16-feb.-22	15-mar.-22	28	\$ 13.972.457,75	18,93%	\$ 189.763,61
16-mar.-22	30-mar.-22	15	\$ 13.972.457,75	18,93%	\$ 101.659,08
TOTAL					\$ 2.724.463,22

1- LIQUIDACIÓN INTERESES DE MORA CUOTA AGOSTO DE 2020

VR CUOTA EN PESOS			\$ 289.618,76		
FECHA		DÍAS	CAPITAL	MORA ANUAL	INTERÉS MORATORIOS
DESDE	HASTA				
16-jul.-20	15-ago.-20	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-ago.-20	15-sep.-20	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-sep.-20	15-oct.-20	30	\$ 289.618,76	18,93%	\$ 4.214,34
16-oct.-20	15-nov.-20	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-nov.-20	15-dic.-20	30	\$ 289.618,76	18,93%	\$ 4.214,34
16-dic.-20	15-ene.-21	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-ene.-21	15-feb.-21	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-feb.-21	15-mar.-21	28	\$ 289.618,76	18,93%	\$ 3.933,39
16-mar.-21	15-abr.-21	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-abr.-21	15-may.-21	30	\$ 289.618,76	18,93%	\$ 4.214,34
16-may.-21	15-jun.-21	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-jun.-21	15-jul.-21	30	\$ 289.618,76	18,93%	\$ 4.214,34
16-jul.-21	15-ago.-21	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-ago.-21	15-sep.-21	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-sep.-21	15-oct.-21	30	\$ 289.618,76	18,93%	\$ 4.214,34
16-oct.-21	15-nov.-21	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-nov.-21	15-dic.-21	30	\$ 289.618,76	18,93%	\$ 4.214,34
16-dic.-21	15-ene.-22	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-ene.-22	15-feb.-22	31	\$ 289.618,76	18,93%	\$ 4.354,82
16-feb.-22	15-mar.-22	28	\$ 289.618,76	18,93%	\$ 3.933,39
16-mar.-22	30-mar.-22	15	\$ 289.618,76	18,93%	\$ 2.107,17
TOTAL					\$ 87.517,89

3- LIQUIDACIÓN INTERESES DE MORA CUOTA SEPTIEMBRE DE 2020

VR CUOTA EN PESOS	\$ 292.502,07
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FECHA		DÍAS	CAPITAL	MORA ANUAL	INTERÉS MORATORIOS
DESDE	HASTA				
16-ago.-20	15-sep.-20	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-sep.-20	15-oct.-20	30	\$ 292.502,07	18,93%	\$ 4.256,30
16-oct.-20	15-nov.-20	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-nov.-20	15-dic.-20	30	\$ 292.502,07	18,93%	\$ 4.256,30
16-dic.-20	15-ene.-21	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-ene.-21	15-feb.-21	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-feb.-21	15-mar.-21	28	\$ 292.502,07	18,93%	\$ 3.972,55
16-mar.-21	15-abr.-21	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-abr.-21	15-may.-21	30	\$ 292.502,07	18,93%	\$ 4.256,30
16-may.-21	15-jun.-21	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-jun.-21	15-jul.-21	30	\$ 292.502,07	18,93%	\$ 4.256,30
16-jul.-21	15-ago.-21	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-ago.-21	15-sep.-21	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-sep.-21	15-oct.-21	30	\$ 292.502,07	18,93%	\$ 4.256,30
16-oct.-21	15-nov.-21	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-nov.-21	15-dic.-21	30	\$ 292.502,07	18,93%	\$ 4.256,30
16-dic.-21	15-ene.-22	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-ene.-22	15-feb.-22	31	\$ 292.502,07	18,93%	\$ 4.398,18
16-feb.-22	15-mar.-22	28	\$ 292.502,07	18,93%	\$ 3.972,55
16-mar.-22	30-mar.-22	15	\$ 292.502,07	18,93%	\$ 2.128,15
TOTAL					\$ 83.991,00

4- LIQUIDACIÓN INTERESES DE MORA CUOTA OCTUBRE DE 2020

VR CUOTA EN PESOS	\$ 295.414,00
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FECHA		DÍAS	CAPITAL	MORA ANUAL	INTERÉS MORATORIOS
DESDE	HASTA				
16-sep.-20	15-oct.-20	30	\$ 295.414,00	18,93%	\$ 4.298,67
16-oct.-20	15-nov.-20	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-nov.-20	15-dic.-20	30	\$ 295.414,00	18,93%	\$ 4.298,67
16-dic.-20	15-ene.-21	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-ene.-21	15-feb.-21	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-feb.-21	15-mar.-21	28	\$ 295.414,00	18,93%	\$ 4.012,09
16-mar.-21	15-abr.-21	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-abr.-21	15-may.-21	30	\$ 295.414,00	18,93%	\$ 4.298,67
16-may.-21	15-jun.-21	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-jun.-21	15-jul.-21	30	\$ 295.414,00	18,93%	\$ 4.298,67
16-jul.-21	15-ago.-21	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-ago.-21	15-sep.-21	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-sep.-21	15-oct.-21	30	\$ 295.414,00	18,93%	\$ 4.298,67
16-oct.-21	15-nov.-21	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-nov.-21	15-dic.-21	30	\$ 295.414,00	18,93%	\$ 4.298,67
16-dic.-21	15-ene.-22	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-ene.-22	15-feb.-22	31	\$ 295.414,00	18,93%	\$ 4.441,96
16-feb.-22	15-mar.-22	28	\$ 295.414,00	18,93%	\$ 4.012,09
16-mar.-22	30-mar.-22	15	\$ 295.414,00	18,93%	\$ 2.149,34
TOTAL					\$ 80.385,19

5- LIQUIDACIÓN INTERESES DE MORA CUOTA NOVIEMBRE DE 2020

VR CUOTA EN PESOS	\$ 298.355,09
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FECHA		DÍAS	CAPITAL	MORA ANUAL	INTERÉS MORATORIOS
DESDE	HASTA				
16-oct.-20	15-nov.-20	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-nov.-20	15-dic.-20	30	\$ 298.355,09	18,93%	\$ 4.341,47

16-dic.-20	15-ene.-21	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-ene.-21	15-feb.-21	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-feb.-21	15-mar.-21	28	\$ 298.355,09	18,93%	\$ 4.052,04
16-mar.-21	15-abr.-21	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-abr.-21	15-may.-21	30	\$ 298.355,09	18,93%	\$ 4.341,47
16-may.-21	15-jun.-21	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-jun.-21	15-jul.-21	30	\$ 298.355,09	18,93%	\$ 4.341,47
16-jul.-21	15-ago.-21	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-ago.-21	15-sep.-21	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-sep.-21	15-oct.-21	30	\$ 298.355,09	18,93%	\$ 4.341,47
16-oct.-21	15-nov.-21	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-nov.-21	15-dic.-21	30	\$ 298.355,09	18,93%	\$ 4.341,47
16-dic.-21	15-ene.-22	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-ene.-22	15-feb.-22	31	\$ 298.355,09	18,93%	\$ 4.486,19
16-feb.-22	15-mar.-22	28	\$ 298.355,09	18,93%	\$ 4.052,04
16-mar.-22	28-mar.-22	13	\$ 298.355,09	18,93%	\$ 1.881,30
TOTAL					\$ 76.554,59

6- LIQUIDACIÓN INTERESES DE MORA CUOTA DICIEMBRE DE 2020

VR CUOTA EN PESOS	\$ 301.325,38
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FECHA		DÍAS	CAPITAL	MORA ANUAL	INTERÉS MORATORIOS
DESDE	HASTA				
16-nov.-20	15-dic.-20	30	\$ 301.325,38	18,93%	\$ 4.384,69
16-dic.-20	15-ene.-21	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-ene.-21	15-feb.-21	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-feb.-21	15-mar.-21	28	\$ 301.325,38	18,93%	\$ 4.092,38
16-mar.-21	15-abr.-21	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-abr.-21	15-may.-21	30	\$ 301.325,38	18,93%	\$ 4.384,69
16-may.-21	15-jun.-21	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-jun.-21	15-jul.-21	30	\$ 301.325,38	18,93%	\$ 4.384,69
16-jul.-21	15-ago.-21	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-ago.-21	15-sep.-21	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-sep.-21	15-oct.-21	30	\$ 301.325,38	18,93%	\$ 4.384,69
16-oct.-21	15-nov.-21	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-nov.-21	15-dic.-21	30	\$ 301.325,38	18,93%	\$ 4.384,69
16-dic.-21	15-ene.-22	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-ene.-22	15-feb.-22	31	\$ 301.325,38	18,93%	\$ 4.530,85
16-feb.-22	15-mar.-22	28	\$ 301.325,38	18,93%	\$ 4.092,38
16-mar.-22	30-mar.-22	15	\$ 301.325,38	18,93%	\$ 2.192,35
TOTAL					\$ 73.078,19

CAPITAL ACELERADO	\$ 13.972.457,75
INTERES DE MORA SOBRE CAPITAL ACELERADO	\$ 2.724.463,22
CAPITAL DE CUOTAS EN MORA	\$ 1.477.215,30
INTERES DE MORA SOBRE CUOTAS EN MORA	\$ 401.526,85
INTERES DE PLAZO	\$ 825.257,88

TOTAL	\$ 19.400.921,00
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