


Liquidación Rad. 2022-00243

FABIO TOVAR DANIEL <fabio_tovar@hotmail.com>

Mié 13/09/2023 11:46

Para: Juzgado 01 Laboral Circuito - Cundinamarca - Girardot <jlctogir@cendoj.ramajudicial.gov.co>

CC: Diana Patricia Oyola Ramirez <doyola@colfondos.com.co>; Luz Stella Montes Aguirre <luesma16@hotmail.com>

 2 archivos adjuntos (348 KB)

LIQUIDACIÓN STELLA MONTES AGUIRRE.pdf; Liqu.xlsx;

FABIO TOVAR DAVOZ

Abogado

T.P. 71787 del C.S. de la Judicatura - CC 11.306.972

Señora,
Juez Laboral del Circuito de Girardot
jlctogir@cendoj.ramajudicial.gov.co

Ref.: **Radicación No.: 25307310500120220024300**
Demandantes: LUZ STELLA MONTES AGUIRRE
Demandado: COLFONDOS PENSIONES Y CESANTÍAS.

Respetuosamente,

En mi condición de apoderado por activa, hago llegar la respectiva liquidación del crédito, así

MESADAS INSOLUTAS

De	Hasta	Días	V. M. Ord.	M. Adic.	T. Mes	saldo
Deuda			-\$ 1.987.547		-\$ 1.987.547	-\$ 1.987.547
23-jun-2012	30-jun-2012	8	\$151.120	\$151.120	\$302.240	-\$ 1.685.307
01-jul-2012	31-jul-2012	30	\$566.700		\$566.700	-\$ 1.118.607
01-ago-2012	31-ago-2012	30	\$566.700		\$566.700	-\$ 551.907
01-sep-2012	30-sep-2012	30	\$566.700		\$566.700	\$14.793
01-oct-2012	31-oct-2012	30	\$566.700		\$566.700	\$581.493
01-nov-2012	30-nov-2012	30	\$566.700		\$566.700	\$1.148.193
01-dic-2012	31-dic-2012	30	\$566.700	\$566.700	\$1.133.400	\$2.281.593
01-ene-2013	31-ene-2013	30	\$589.500		\$589.500	\$2.871.093
01-feb-2013	28-feb-2013	30	\$589.500		\$589.500	\$3.460.593
01-mar-2013	31-mar-2013	30	\$589.500		\$589.500	\$4.050.093
01-abr-2013	30-abr-2013	30	\$589.500		\$589.500	\$4.639.593
01-may-2013	31-may-2013	30	\$589.500		\$589.500	\$5.229.093
01-jun-2013	30-jun-2013	30	\$589.500	\$589.500	\$1.179.000	\$6.408.093
01-jul-2013	31-jul-2013	30	\$589.500		\$589.500	\$6.997.593
01-ago-2013	31-ago-2013	30	\$589.500		\$589.500	\$7.587.093
01-sep-2013	30-sep-2013	30	\$589.500		\$589.500	\$8.176.593
01-oct-2013	31-oct-2013	30	\$589.500		\$589.500	\$8.766.093
01-nov-2013	30-nov-2013	30	\$589.500		\$589.500	\$9.355.593
01-dic-2013	31-dic-2013	30	\$589.500	\$589.500	\$1.179.000	\$10.534.593
01-ene-2014	31-ene-2014	30	\$616.000		\$616.000	\$11.150.593
01-feb-2014	28-feb-2014	30	\$616.000		\$616.000	\$11.766.593
01-mar-2014	31-mar-2014	30	\$616.000		\$616.000	\$12.382.593
01-abr-2014	30-abr-2014	30	\$616.000		\$616.000	\$12.998.593
01-may-2014	31-may-2014	30	\$616.000		\$616.000	\$13.614.593
01-jun-2014	30-jun-2014	30	\$616.000	\$616.000	\$1.232.000	\$14.846.593
01-jul-2014	31-jul-2014	30	\$616.000		\$616.000	\$15.462.593
01-ago-2014	31-ago-2014	30	\$616.000		\$616.000	\$16.078.593
01-sep-2014	30-sep-2014	30	\$616.000		\$616.000	\$16.694.593
01-oct-2014	31-oct-2014	30	\$616.000		\$616.000	\$17.310.593

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01-nov-2014	30-nov-2014	30	\$616.000		\$616.000	\$17.926.593
01-dic-2014	31-dic-2014	30	\$616.000	\$616.000	\$1.232.000	\$19.158.593
01-ene-2015	31-ene-2015	30	\$644.350		\$644.350	\$19.802.943
01-feb-2015	28-feb-2015	30	\$644.350		\$644.350	\$20.447.293
01-mar-2015	31-mar-2015	30	\$644.350		\$644.350	\$21.091.643
01-abr-2015	30-abr-2015	30	\$644.350		\$644.350	\$21.735.993
01-may-2015	31-may-2015	30	\$644.350		\$644.350	\$22.380.343
01-jun-2015	30-jun-2015	30	\$644.350	\$644.350	\$1.288.700	\$23.669.043
01-jul-2015	31-jul-2015	30	\$644.350		\$644.350	\$24.313.393
01-ago-2015	31-ago-2015	30	\$644.350		\$644.350	\$24.957.743
01-sep-2015	30-sep-2015	30	\$644.350		\$644.350	\$25.602.093
01-oct-2015	31-oct-2015	30	\$644.350		\$644.350	\$26.246.443
01-nov-2015	30-nov-2015	30	\$644.350		\$644.350	\$26.890.793
01-dic-2015	31-dic-2015	30	\$644.350	\$644.350	\$1.288.700	\$28.179.493
01-ene-2016	31-ene-2016	30	\$689.455		\$689.455	\$28.868.948
01-feb-2016	29-feb-2016	30	\$689.455		\$689.455	\$29.558.403
01-mar-2016	31-mar-2016	30	\$689.455		\$689.455	\$30.247.858
01-abr-2016	30-abr-2016	30	\$689.455		\$689.455	\$30.937.313
01-may-2016	31-may-2016	30	\$689.455		\$689.455	\$31.626.768
01-jun-2016	30-jun-2016	30	\$689.455	\$689.455	\$1.378.910	\$33.005.678
01-jul-2016	31-jul-2016	30	\$689.455		\$689.455	\$33.695.133
01-ago-2016	31-ago-2016	30	\$689.455		\$689.455	\$34.384.588
01-sep-2016	30-sep-2016	30	\$689.455		\$689.455	\$35.074.043
01-oct-2016	31-oct-2016	30	\$689.455		\$689.455	\$35.763.498
01-nov-2016	30-nov-2016	30	\$689.455		\$689.455	\$36.452.953
01-dic-2016	31-dic-2016	30	\$689.455	\$689.455	\$1.378.910	\$37.831.863
01-ene-2017	31-ene-2017	30	\$737.717		\$737.717	\$38.569.580
01-feb-2017	28-feb-2017	30	\$737.717		\$737.717	\$39.307.297
01-mar-2017	31-mar-2017	30	\$737.717		\$737.717	\$40.045.014
01-abr-2017	30-abr-2017	30	\$737.717		\$737.717	\$40.782.731
01-may-2017	31-may-2017	30	\$737.717		\$737.717	\$41.520.448
01-jun-2017	30-jun-2017	30	\$737.717	\$737.717	\$1.475.434	\$42.995.882
01-jul-2017	31-jul-2017	30	\$737.717		\$737.717	\$43.733.599
01-ago-2017	31-ago-2017	30	\$737.717		\$737.717	\$44.471.316
01-sep-2017	30-sep-2017	30	\$737.717		\$737.717	\$45.209.033
01-oct-2017	31-oct-2017	30	\$737.717		\$737.717	\$45.946.750
01-nov-2017	30-nov-2017	30	\$737.717		\$737.717	\$46.684.467
01-dic-2017	31-dic-2017	30	\$737.717	\$737.717	\$1.475.434	\$48.159.901
01-ene-2018	31-ene-2018	30	\$781.242		\$781.242	\$48.941.143
01-feb-2018	28-feb-2018	30	\$781.242		\$781.242	\$49.722.385
01-mar-2018	31-mar-2018	30	\$781.242		\$781.242	\$50.503.627
01-abr-2018	30-abr-2018	30	\$781.242		\$781.242	\$51.284.869
01-may-2018	31-may-2018	30	\$781.242		\$781.242	\$52.066.111
01-jun-2018	30-jun-2018	30	\$781.242	\$781.242	\$1.562.484	\$53.628.595
01-jul-2018	31-jul-2018	30	\$781.242		\$781.242	\$54.409.837
01-ago-2018	31-ago-2018	30	\$781.242		\$781.242	\$55.191.079

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01-sep-2018	30-sep-2018	30	\$781.242		\$781.242	\$55.972.321
01-oct-2018	31-oct-2018	30	\$781.242		\$781.242	\$56.753.563
01-nov-2018	30-nov-2018	30	\$781.242		\$781.242	\$57.534.805
01-dic-2018	31-dic-2018	30	\$781.242	\$781.242	\$1.562.484	\$59.097.289
01-ene-2019	31-ene-2019	30	\$828.116		\$828.116	\$59.925.405
01-feb-2019	28-feb-2019	30	\$828.116		\$828.116	\$60.753.521
01-mar-2019	31-mar-2019	30	\$828.116		\$828.116	\$61.581.637
01-abr-2019	30-abr-2019	30	\$828.116		\$828.116	\$62.409.753
01-may-2019	31-may-2019	30	\$828.116		\$828.116	\$63.237.869
01-jun-2019	30-jun-2019	30	\$828.116	\$828.116	\$1.656.232	\$64.894.101
01-jul-2019	31-jul-2019	30	\$828.116		\$828.116	\$65.722.217
01-ago-2019	31-ago-2019	30	\$828.116		\$828.116	\$66.550.333
01-sep-2019	30-sep-2019	30	\$828.116		\$828.116	\$67.378.449
01-oct-2019	31-oct-2019	30	\$828.116		\$828.116	\$68.206.565
01-nov-2019	30-nov-2019	30	\$828.116		\$828.116	\$69.034.681
01-dic-2019	31-dic-2019	30	\$828.116	\$828.116	\$1.656.232	\$70.690.913
01-ene-2020	31-ene-2020	30	\$877.803		\$877.803	\$71.568.716
01-feb-2020	29-feb-2020	30	\$877.803		\$877.803	\$72.446.519
01-mar-2020	31-mar-2020	30	\$877.803		\$877.803	\$73.324.322
01-abr-2020	30-abr-2020	30	\$877.803		\$877.803	\$74.202.125
01-may-2020	31-may-2020	30	\$877.803		\$877.803	\$75.079.928
01-jun-2020	30-jun-2020	30	\$877.803	\$877.803	\$1.755.606	\$76.835.534
01-jul-2020	31-jul-2020	30	\$877.803		\$877.803	\$77.713.337
01-ago-2020	31-ago-2020	30	\$877.803		\$877.803	\$78.591.140
01-sep-2020	30-sep-2020	30	\$877.803		\$877.803	\$79.468.943
01-oct-2020	31-oct-2020	30	\$877.803		\$877.803	\$80.346.746
01-nov-2020	30-nov-2020	30	\$877.803		\$877.803	\$81.224.549
01-dic-2020	31-dic-2020	30	\$877.803	\$877.803	\$1.755.606	\$82.980.155
01-ene-2021	31-ene-2021	30	\$908.526		\$908.526	\$83.888.681
01-feb-2021	28-feb-2021	30	\$908.526		\$908.526	\$84.797.207
01-mar-2021	31-mar-2021	30	\$908.526		\$908.526	\$85.705.733
01-abr-2021	30-abr-2021	30	\$908.526		\$908.526	\$86.614.259
01-may-2021	31-may-2021	30	\$908.526		\$908.526	\$87.522.785
01-jun-2021	30-jun-2021	30	\$908.526	\$908.526	\$1.817.052	\$89.339.837
01-jul-2021	31-jul-2021	30	\$908.526		\$908.526	\$90.248.363
01-ago-2021	31-ago-2021	30	\$908.526		\$908.526	\$91.156.889
01-sep-2021	30-sep-2021	30	\$908.526		\$908.526	\$92.065.415
01-oct-2021	31-oct-2021	30	\$908.526		\$908.526	\$92.973.941
01-nov-2021	30-nov-2021	30	\$908.526		\$908.526	\$93.882.467
01-dic-2021	31-dic-2021	30	\$908.526	\$908.526	\$1.817.052	\$95.699.519
01-ene-2022	31-ene-2022	30	\$1.000.000		\$1.000.000	\$96.699.519
01-feb-2022	28-feb-2022	30	\$1.000.000		\$1.000.000	\$97.699.519
01-mar-2022	31-mar-2022	30	\$1.000.000		\$1.000.000	\$98.699.519
01-abr-2022	30-abr-2022	30	\$1.000.000		\$1.000.000	\$99.699.519
01-may-2022	31-may-2022	30	\$1.000.000		\$1.000.000	\$100.699.519
01-jun-2022	30-jun-2022	30	\$1.000.000	\$1.000.000	\$2.000.000	\$102.699.519

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01-jul-2022	31-jul-2022	30	\$1.000.000		\$1.000.000	\$103.699.519
01-ago-2022	31-ago-2022	30	\$1.000.000		\$1.000.000	\$104.699.519
01-sep-2022	30-sep-2022	30	\$1.000.000		\$1.000.000	\$105.699.519
01-oct-2022	31-oct-2022	30	\$1.000.000		\$1.000.000	\$106.699.519
01-nov-2022	30-nov-2022	30	\$1.000.000		\$1.000.000	\$107.699.519
01-dic-2022	31-dic-2022	30	\$1.000.000	\$1.000.000	\$2.000.000	\$109.699.519
01-ene-2023	31-ene-2023	30	\$1.160.000		\$1.160.000	\$110.859.519
01-feb-2023	28-feb-2023	30	\$1.160.000		\$1.160.000	\$112.019.519
01-mar-2023	31-mar-2023	30	\$1.160.000		\$1.160.000	\$113.179.519
01-abr-2023	30-abr-2023	30	\$1.160.000		\$1.160.000	\$114.339.519
01-may-2023	31-may-2023	30	\$1.160.000		\$1.160.000	\$115.499.519
01-jun-2023	30-jun-2023	30	\$1.160.000	\$1.160.000	\$2.320.000	\$117.819.519
01-jul-2023	31-jul-2023	30	\$1.160.000		\$1.160.000	\$118.979.519
01-ago-2023	31-ago-2023	30	\$1.160.000		\$1.160.000	\$120.139.519
01-sep-2023	13-sep-2023	13	\$502.667		\$502.667	\$120.642.186
subtotales			\$103.418.948	\$17.223.238	\$120.642.186	\$120.642.186

LIQUIDACIÓN INTERESES MORATORIOS

De	Hasta	Días	Mora/mes	Capital Ac.	V. Intereses
18-jul-2022	31-jul-2022	14	1,09%	\$ 103.699.519,00	\$ 1.130.172,15
01-ago-2022	31-ago-2022	30	2,43%	\$ 104.699.519,00	\$ 2.539.114,49
01-sep-2022	30-sep-2022	30	2,55%	\$ 105.699.519,00	\$ 2.693.451,22
01-oct-2022	31-oct-2022	30	2,65%	\$ 106.699.519,00	\$ 2.830.554,94
01-nov-2022	30-nov-2022	30	2,76%	\$ 107.699.519,00	\$ 2.974.489,51
01-dic-2022	31-dic-2022	30	2,93%	\$ 109.699.519,00	\$ 3.217.012,11
01-ene-2023	31-ene-2023	30	2,34%	\$ 110.859.519,00	\$ 2.589.012,02
01-feb-2023	28-feb-2023	30	2,34%	\$ 112.019.519,00	\$ 2.616.102,65
01-mar-2023	31-mar-2023	30	2,34%	\$ 113.179.519,00	\$ 2.643.193,27
01-abr-2023	30-abr-2023	30	2,34%	\$ 114.339.519,00	\$ 2.670.283,90
01-may-2023	31-may-2023	30	2,34%	\$ 115.499.519,00	\$ 2.697.374,53
01-jun-2023	30-jun-2023	30	2,34%	\$ 117.819.519,00	\$ 2.751.555,78
01-jul-2023	31-jul-2023	30	2,34%	\$ 118.979.519,00	\$ 2.778.646,41
01-ago-2023	31-ago-2023	30	2,34%	\$ 120.139.519,00	\$ 2.805.737,04
01-sep-2023	13-sep-2023	13	1,01%	\$ 120.642.185,67	\$ 1.220.906,40
Total intereses Moratorios					\$ 38.157.606,42

RESUMEN

MESADAS¹

Año	Mes. Ord.	M. Adi.	V. Mes Ord.	V. Me Adic.	Subtotal
2012	7	2	\$3.551.320	\$717.820	\$4.269.140
2013	12	2	\$7.074.000	\$1.179.000	\$8.253.000
2014	12	2	\$7.392.000	\$1.232.000	\$8.624.000
2015	12	2	\$7.732.200	\$1.288.700	\$9.020.900
2016	12	2	\$8.273.460	\$1.378.910	\$9.652.370

¹ En este cuadro no se tiene en cuenta el valor a deducir por porte de COLFONDOS.

FABIO TOVAR DANIEL

Abogado

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2017	12	2	\$8.852.604	\$1.475.434	\$10.328.038
2018	12	2	\$9.374.904	\$1.562.484	\$10.937.388
2019	12	2	\$9.937.392	\$1.656.232	\$11.593.624
2020	12	2	\$10.533.636	\$1.755.606	\$12.289.242
2021	12	2	\$10.902.312	\$1.817.052	\$12.719.364
2022	12	2	\$12.000.000	\$2.000.000	\$14.000.000
2023	9	1	\$9.782.667	\$1.160.000	\$10.942.667

RESUMEN FINAL

Concepto	De	Hasta	Meses	Valor
Mesada Ordinarias	23-jun-2012	13-sep-2023	136	\$105.406.495
Mesadas Adicionales	23-jun-2012	13-sep-2023	23	\$17.223.238
Menos lo pagado por Colfondos				-\$ 1.987.547
Intereses Moratorios	18-jul-2022	13-sep-2023	14	\$38.157.606
Costas Ejecutivo				\$5.000.000
Total				\$163.799.792

Son: CIENTO SESENTA Y TRES MILLONES SEISCIENTOS SETECIENTOS NOVENTA Y NUEVE MIL SETECIENTOS NOVENTA Y DOS PESOS M/CTE. LEGAL

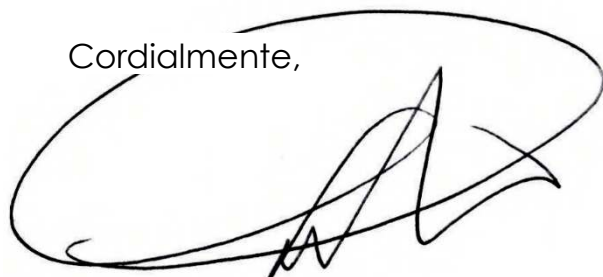
Para la liquidación se tuvo en cuenta deducir inicialmente la suma de \$1.987.547, y la causación de las mesadas adicionales de junio y diciembre.

Los intereses se comenzaron a liquidar sobre el capital insoluto y a partir del 18 de julio de 2022, causados hasta la fecha de hoy 13 de sept. de 23.

Se deja constancia que la accionada no ha accedido a la fecha, a incluir a mi prohijada en su nómina de pensionados. Ello para su conocimiento y fines pertinentes.

Anexo: Hojas de Excel con la información actualizada de Salarios e intereses bancarios, para su constatación y revisión de los valores y fórmulas empleadas.

Cordialmente,



FABIO TOVAR DANIEL
C.C. 11.306.972 de Gdot.
T.P. 71787 C.S.Jud.

Copia: doyola@colfondos.com.co - luesma16@hotmail.com