

RPM ABOGADOS S.A.S.

3152426333

Calle 85 No. 19 A -25 Oficina 402 A – Teléfono 2183494

rpmabogado@gmail.com

Bogotá DC.

SEÑOR

JUEZ 43 CIVIL CIRCUITO DE BOGOTA D.C.

E. _____ S. _____ D.

REF.: PROCESO EJECUTIVO DE BANCO PICHINCHA S.A. EN CONTRA DE FAMIPARAISO S.A.S.. Y OTROS

PROCESO No. 2019-456

RAMIRO PACANCHIQUE MORENO, mayor de edad y vecino de esta ciudad, identificado con la Cédula de Ciudadanía No. 80.417.255 de Bogotá, Abogado titulado en ejercicio portador de la Tarjeta Profesional No. 86.755 expedida por el Consejo Superior de la Judicatura, en mi calidad de Apoderado Judicial del **BANCO PICHINCHA S.A.** en el asunto de la referencia, mediante el presente escrito me permito remitir Liquidación del Crédito de acuerdo a lo establecido en el artículo 446 del CGP, para su trámite de aprobación

Tener en cuenta que al día 07 de diciembre de 2021, las obligaciones asciendes a las siguientes sumas:

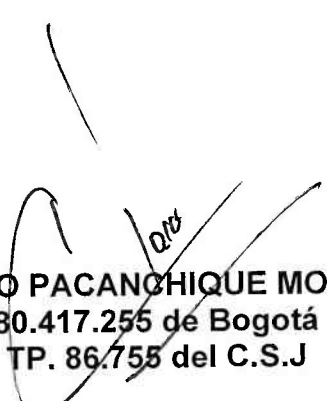
1º.- OBLIGACION 9040692 (100004626)

CONCEPTO	MONTO
CAPITAL	\$100.000.007.00
INTERESES DE MORA	\$93.851.094.00
INTERESES CORRIENTES	\$0.00
TOTAL	\$193.851.101.00

2º.- OBLIGACION 9040692 (100006184)

CONCEPTO	MONTO
CAPITAL	\$32.222.223.00
INTERESES DE MORA	\$29.899.557.00
INTERESES CORRIENTES	\$0.00
TOTAL	\$62.121.780.00

Del señor Juez,


RAMIRO PACANCHIQUE MORENO
CC. 80.417.255 de Bogotá D.C
TP. 86.755 del C.S.J

INTERESES DE MORA

DESDE	HASTA	TASA	1/2 INT.	PERIODO	DIAS	CUOTA	CAPITAL	INTERES	ABONO	TOTAL INTERESES	SALDO
23/03/2018	30/03/2018	20,68	10,34	2,28%	9	\$ 100.000,007	\$ 100.000,007	\$ 683,111		\$ 683,111	\$ 100,683,118
1/04/2018	30/04/2018	20,48	10,24	2,26%	30		\$ 100.000,007	\$ 2.257,500		\$ 2.940,611	\$ 102,940,618
1/05/2018	30/05/2018	20,44	10,22	2,25%	31		\$ 100.000,007	\$ 2.328,707		\$ 5.269,318	\$ 105,269,325
1/06/2018	30/06/2018	20,28	10,14	2,24%	30		\$ 100.000,007	\$ 2.237,923		\$ 7.507,241	\$ 107,507,248
1/07/2018	30/07/2018	20,03	10,015	2,21%	31		\$ 100.000,007	\$ 2.287,173		\$ 9.794,414	\$ 109,794,421
1/08/2018	30/08/2018	19,94	9,97	2,20%	31		\$ 100.000,007	\$ 2.278,031		\$ 12.072,445	\$ 112,072,452
2/09/2018	30/09/2018	19,81	9,905	2,19%	30		\$ 100.000,007	\$ 2.191,753		\$ 14.264,199	\$ 114,264,206
1/10/2018	31/10/2018	19,68	9,84	2,18%	31		\$ 100.000,007	\$ 2.251,574		\$ 16.515,773	\$ 116,515,780
1/11/2018	30/11/2018	19,49	9,75	2,16%	30		\$ 100.000,007	\$ 2.160,187		\$ 18,675,960	\$ 118,675,967
1/12/2018	31/12/2018	19,4	9,7	2,15%	31		\$ 100.000,007	\$ 2.222,999		\$ 20,898,959	\$ 120,898,966
1/01/2019	31/01/2019	19,16	9,58	2,13%	31		\$ 100.000,007	\$ 2.198,439		\$ 23,097,398	\$ 123,097,405
1/02/2019	28/02/2019	19,7	9,85	2,18%	28		\$ 100.000,007	\$ 2.035,520		\$ 25,132,918	\$ 125,132,925
1/03/2019	30/03/2019	19,37	9,685	2,15%	31		\$ 100.000,007	\$ 2.219,933		\$ 27,352,851	\$ 127,352,858
1/04/2019	30/04/2019	19,32	9,66	2,14%	30		\$ 100.000,007	\$ 2.143,374		\$ 29,496,225	\$ 129,496,232
1/05/2019	30/05/2019	19,34	9,67	2,15%	31		\$ 100.000,007	\$ 2.216,865		\$ 31,713,090	\$ 131,713,097
1/06/2019	30/06/2019	19,3	9,65	2,14%	30		\$ 100.000,007	\$ 2.141,394		\$ 33,854,484	\$ 133,854,491
1/07/2019	30/07/2019	19,28	9,64	2,14%	31		\$ 100.000,007	\$ 2.210,727		\$ 36,065,211	\$ 136,065,218
1/08/2019	30/08/2019	19,32	9,66	2,14%	31		\$ 100.000,007	\$ 2.214,820		\$ 38,280,030	\$ 138,280,037
1/09/2019	30/09/2019	19,32	9,66	2,14%	31		\$ 100.000,007	\$ 2.143,374		\$ 40,423,404	\$ 140,423,411
1/10/2019	30/10/2019	19,1	9,55	2,12%	31		\$ 100.000,007	\$ 2.192,289		\$ 42,615,693	\$ 142,615,700
1/11/2019	30/11/2019	19,03	9,515	2,11%	30		\$ 100.000,007	\$ 2.114,622		\$ 44,730,315	\$ 144,730,322
1/12/2019	30/12/2019	18,91	9,455	2,10%	31		\$ 100.000,007	\$ 2.172,788		\$ 46,903,103	\$ 146,903,110
1/01/2020	31/01/2020	18,77	9,385	2,09%	31		\$ 100.000,007	\$ 2.158,394		\$ 49,061,497	\$ 149,061,504
1/02/2020	29/02/2020	19,06	9,53	2,12%	29		\$ 100.000,007	\$ 2.047,014		\$ 51,108,510	\$ 151,108,517
1/03/2020	31/03/2020	18,95	9,475	2,11%	31		\$ 100.000,007	\$ 2.176,897		\$ 53,285,407	\$ 153,285,414
1/04/2020	30/04/2020	18,69	9,345	2,08%	30		\$ 100.000,007	\$ 2.080,799		\$ 55,366,206	\$ 155,366,213
1/05/2020	31/05/2020	18,19	9,095	2,03%	31		\$ 100.000,007	\$ 2.098,528		\$ 57,464,734	\$ 157,464,741
1/06/2020	30/06/2020	18,12	9,06	2,02%	30		\$ 100.000,007	\$ 2.023,817		\$ 59,488,552	\$ 159,488,559
1/07/2020	30/07/2020	18,12	9,06	2,02%	31		\$ 100.000,007	\$ 2.091,278		\$ 61,579,830	\$ 161,579,837

1/08/2020	30/08/2020	18,29	9,145	2,04%	31		\$ 100,000.007	\$ 2,108.877		\$ 63,688.706	\$ 163,688.713
1/09/2020	30/09/2020	18,35	9,175	2,05%	30		\$ 100,000.007	\$ 2,046.852		\$ 65,735.558	\$ 165,735.565
1/10/2020	30/10/2020	18,09	9,045	2,02%	31		\$ 100,000.007	\$ 2,088.169		\$ 67,823.727	\$ 167,823.734
1/11/2020	30/11/2020	17,84	8,92	2,00%	30		\$ 100,000.007	\$ 1,995.698		\$ 69,819.425	\$ 169,819.432
1/12/2020	30/12/2020	17,46	8,73	1,96%	31		\$ 100,000.007	\$ 2,022.645		\$ 71,842.070	\$ 171,842.077
1/01/2021	31/01/2021	17,32	8,66	1,94%	31		\$ 100,000.007	\$ 2,008.023		\$ 73,850.093	\$ 173,850.100
1/02/2021	28/02/2021	17,54	8,77	1,97%	28		\$ 100,000.007	\$ 1,834.443		\$ 75,684.536	\$ 175,684.543
1/03/2021	31/03/2021	17,41	8,705	1,95%	31		\$ 100,000.007	\$ 2,017.426		\$ 77,701.962	\$ 177,701.969
1/04/2021	31/04/2021	17,31	8,655	1,94%	30		\$ 100,000.007	\$ 1,942.237		\$ 79,644.198	\$ 179,644.205
1/05/2021	31/05/2021	17,22	8,61	1,93%	31		\$ 100,000.007	\$ 1,997.565		\$ 81,641.764	\$ 181,641.771
1/06/2021	31/06/21	17,21	8,605	1,93%	30		\$ 100,000.007	\$ 1,932.115		\$ 83,573.879	\$ 183,573.886
1/07/2021	31/07/2021	17,18	8,59	1,93%	31		\$ 100,000.007	\$ 1,993.379		\$ 85,567.258	\$ 185,567.265
1/08/2021	31/08/2021	17,24	8,62	1,94%	31		\$ 100,000.007	\$ 1,999.658		\$ 87,566.915	\$ 187,566.922
1/09/2021	31/09/21	17,19	8,595	1,93%	30		\$ 100,000.007	\$ 1,930.089		\$ 89,497.005	\$ 189,497.012
1/10/2021	31/10/2021	17,08	8,54	1,92%	31		\$ 100,000.007	\$ 1,982.905		\$ 91,479.910	\$ 191,479.917
1/11/2021	30/11/2021	17,08	8,54	1,92%	30		\$ 100,000.007	\$ 1,918.940		\$ 93,398.850	\$ 193,398.857
1/12/2021	7/12/2021	17,27	8,635	1,94%	7		\$ 100,000.007	\$ 452.244		\$ 93,851.094	\$ 193,851.101

INTERESES DE MORA

DESDE	HASTA	TASA	1/2 INT.	PERIODO	DIAS	CUOTA	CAPITAL	INTERES	ABONO	TOTAL INTERESES	SALDO
6/04/2018	30/04/2018	20,48	10,24	2,26%	25	\$ 32.222.223	\$ 32.222.223	\$ 606.181		\$ 606.181	\$ 32.828.404
1/05/2018	30/05/2018	20,44	10,22	2,25%	31		\$ 32.222.223	\$ 750.361		\$ 1.356.542	\$ 33.578.765
1/06/2018	30/06/2018	20,28	10,14	2,24%	30		\$ 32.222.223	\$ 721.108		\$ 2.077.650	\$ 34.299.873
1/07/2018	30/07/2018	20,03	10,015	2,21%	31		\$ 32.222.223	\$ 736.978		\$ 2.814.628	\$ 35.036.851
1/08/2018	30/08/2018	19,94	9,97	2,20%	31		\$ 32.222.223	\$ 734.032		\$ 3.548.660	\$ 35.770.883
2/09/2018	30/09/2018	19,81	9,905	2,19%	30		\$ 32.222.223	\$ 706.232		\$ 4.254.892	\$ 36.477.115
1/10/2018	31/10/2018	19,68	9,84	2,18%	31		\$ 32.222.223	\$ 725.507		\$ 4.980.399	\$ 37.202.622
1/11/2018	30/11/2018	19,49	9,75	2,16%	30		\$ 32.222.223	\$ 696.060		\$ 5.676.459	\$ 37.898.682
1/12/2018	31/12/2018	19,4	9,7	2,15%	31		\$ 32.222.223	\$ 716.300		\$ 6.392.759	\$ 38.614.982
1/01/2019	31/01/2019	19,16	9,58	2,13%	31		\$ 32.222.223	\$ 708.386		\$ 7.101.145	\$ 39.323.368
1/02/2019	28/02/2019	19,7	9,85	2,18%	28		\$ 32.222.223	\$ 655.890		\$ 7.757.035	\$ 39.979.258
1/03/2019	30/03/2019	19,37	9,685	2,15%	31		\$ 32.222.223	\$ 715.312		\$ 8.472.346	\$ 40.694.569
1/04/2019	30/04/2019	19,32	9,66	2,14%	30		\$ 32.222.223	\$ 690.643		\$ 9.162.989	\$ 41.385.212
1/05/2019	30/05/2019	19,34	9,67	2,15%	31		\$ 32.222.223	\$ 714.323		\$ 9.877.312	\$ 42.099.535
1/06/2019	30/06/2019	19,3	9,65	2,14%	30		\$ 32.222.223	\$ 690.005		\$ 10.567.317	\$ 42.789.540
1/07/2019	30/07/2019	19,28	9,64	2,14%	31		\$ 32.222.223	\$ 712.345		\$ 11.279.662	\$ 43.501.885
1/08/2019	30/08/2019	19,32	9,66	2,14%	31		\$ 32.222.223	\$ 713.664		\$ 11.993.326	\$ 44.215.549
1/09/2019	30/09/2019	19,32	9,66	2,14%	30		\$ 32.222.223	\$ 690.643		\$ 12.683.969	\$ 44.906.192
1/10/2019	30/10/2019	19,1	9,55	2,12%	31		\$ 32.222.223	\$ 706.404		\$ 13.390.373	\$ 45.612.596
1/11/2019	30/11/2019	19,03	9,515	2,11%	30		\$ 32.222.223	\$ 681.378		\$ 14.071.751	\$ 46.293.974
1/12/2019	30/12/2019	18,91	9,455	2,10%	31		\$ 32.222.223	\$ 700.121		\$ 14.771.872	\$ 46.994.095
1/01/2020	31/01/2020	18,77	9,385	2,09%	31		\$ 32.222.223	\$ 695.482		\$ 15.467.354	\$ 47.689.577
1/02/2020	29/02/2020	19,06	9,53	2,12%	29		\$ 32.222.223	\$ 659.593		\$ 16.126.947	\$ 48.349.170
1/03/2020	31/03/2020	18,95	9,475	2,11%	31		\$ 32.222.223	\$ 701.445		\$ 16.828.392	\$ 49.050.615
1/04/2020	30/04/2020	18,69	9,345	2,08%	30		\$ 32.222.223	\$ 670.480		\$ 17.498.872	\$ 49.721.095
1/05/2020	31/05/2020	18,19	9,095	2,03%	31		\$ 32.222.223	\$ 676.192		\$ 18.175.064	\$ 50.397.287
1/06/2020	30/06/2020	18,12	9,06	2,02%	30		\$ 32.222.223	\$ 652.119		\$ 18.827.183	\$ 51.049.406
1/07/2020	30/07/2020	18,12	9,06	2,02%	31		\$ 32.222.223	\$ 673.856		\$ 19.501.039	\$ 51.723.262
1/08/2020	30/08/2020	18,29	9,145	2,04%	31		\$ 32.222.223	\$ 679.527		\$ 20.180.566	\$ 52.402.789

1/09/2020	30/09/2020	18,35	9,175	2,05%	30		\$ 32.222.223	\$ 659.541	\$ 20.840.107	\$ 53.062.330
1/10/2020	30/10/2020	18,09	9,045	2,02%	31		\$ 32.222.223	\$ 672.854	\$ 21.512.961	\$ 53.735.184
1/11/2020	30/11/2020	17,84	8,92	2,00%	30		\$ 32.222.223	\$ 643.058	\$ 22.156.020	\$ 54.378.243
1/12/2020	30/12/2020	17,46	8,73	1,96%	31		\$ 32.222.223	\$ 651.741	\$ 22.807.761	\$ 55.029.984
1/01/2021	31/01/2021	17,32	8,66	1,94%	31		\$ 32.222.223	\$ 647.030	\$ 23.454.790	\$ 55.677.013
1/02/2021	28/02/2021	17,54	8,77	1,97%	28		\$ 32.222.223	\$ 591.098	\$ 24.045.889	\$ 56.268.112
1/03/2021	31/03/2021	17,41	8,705	1,95%	31		\$ 32.222.223	\$ 650.059	\$ 24.695.948	\$ 56.918.171
1/04/2021	31/04/2021	17,31	8,655	1,94%	30		\$ 32.222.223	\$ 625.832	\$ 25.321.780	\$ 57.544.003
1/05/2021	31/05/2021	17,22	8,61	1,93%	31		\$ 32.222.223	\$ 643.660	\$ 25.965.440	\$ 58.187.663
1/06/2021	31/06/21	17,21	8,605	1,93%	30		\$ 32.222.223	\$ 622.570	\$ 26.588.010	\$ 58.810.233
1/07/2021	31/07/2021	17,18	8,59	1,93%	31		\$ 32.222.223	\$ 642.311	\$ 27.230.321	\$ 59.452.544
1/08/2021	31/08/2021	17,24	8,62	1,94%	31		\$ 32.222.223	\$ 644.334	\$ 27.874.655	\$ 60.096.878
1/09/2021	31/09/21	17,19	8,595	1,93%	30		\$ 32.222.223	\$ 621.918	\$ 28.496.573	\$ 60.718.796
1/10/2021	31/10/2021	17,08	8,54	1,92%	31		\$ 32.222.223	\$ 638.936	\$ 29.135.509	\$ 61.357.732
1/11/2021	30/11/2021	17,08	8,54	1,92%	30		\$ 32.222.223	\$ 618.325	\$ 29.753.834	\$ 61.976.057
1/12/2021	7/12/2021	17,27	8,635	1,94%	7		\$ 32.222.223	\$ 145.723	\$ 29.899.557	\$ 62.121.780

**RADICACION MEMORIAL PROCESO NO. 2019-0456 DE BANCO PICHINCHA VS
FAMIPARAISO SAS Y OTROS**

RAMIRO PACANCHIQUE <rpmabogado@gmail.com>

Jue 9/12/2021 4:26 PM

Para: Juzgado 43 Civil Circuito - Bogota - Bogota D.C. <ccto43bt@cendoj.ramajudicial.gov.co>

Respetados Señores

Adjunto y envío memorial con liquidación de crédito, para su debido trámite y conocimiento.

Gracias.

Atentamente,

Ramiro Pacanchique Moreno

CC. 80.417.255

TP. 86.755

RPM ABOGADO S.A.S

PBX 2183494 - Cel 3152426333

Calle 85 No. 19 A -25 Oficina 402 A

Bogotá D.C. - Colombia