EUROPEAN COURT OF HUMAN RIGHTS
COUR EUROPÉENNE DES DROITS DE L'HOMME

THIRD SECTION

DECISION

Application no. 37594/20
Darya Aleksandrovna GRISHINA
against Russia

The European Court of Human Rights (Third Section), sitting on 5 February 2026 as a Committee composed of:

Úna Ní Raifeartaigh*, President*,
Mateja Đurović,
Vasilka Sancin*, judges*,

and Viktoriya Maradudina, *Acting Deputy Section Registrar,*

Having regard to the above application lodged on 18 August 2020,

Having deliberated, decides as follows:

FACTS AND PROCEDURE

The applicant's details are set out in the appended table.

The applicant was represented by Memorial Human Rights Centre.

The applicant's complaints under Article 10 of the Convention concerning the disproportionate measures against solo demonstrators were communicated to the Russian Government ("the Government"). Complaints based on the same facts (see the appended table) were also communicated under other provisions of the Convention.

THE LAW

The Court notes from the outset that, in the present case, the application was lodged more than six months after the final decision in respect of the applicant's grievances under Article 5 § 1, Article 6 §§ 1 and 3 (d) and Article 10 of the Convention was taken (see the appended table). It must therefore ascertain whether the applicant complied with the six-month rule set out in Article 35 § 1 of the Convention.

The Court further notes that, as regards applications introduced in 2020, the method of calculation of the six-month rule has been adjusted in order to handle the difficulties to which the global pandemic and widespread

lockdown gave rise and to preserve the essence of the right of individual petition under Article 34 of the Convention. In particular, the six-month rule was exceptionally considered to have been suspended for three calendar months in total, whenever a calendar six-month period either started to run or, on the contrary, was due to expire at any time between 16 March and 15 June 2020 (see *Saakashvili v. Georgia* (dec.), nos. 6232/20 and 22394/20, §§ 46-59, 1 March 2022).

Turning to the circumstances of the present case, the Court observes that neither the date of the introduction of the application nor the date of the expiration of the six-month time-limit fall within the above-mentioned period (16 March to 15 June 2020). The exceptional measure is therefore not applicable in the present case (compare *Kitanovska and Barbulovski v. North Macedonia*, no. 53030/19, § 39-40, 9 May 2023; and *Masse v. France* (dec.), no. 47506/20, 25 March 2025).

It follows that the application was lodged out of time and must be rejected in accordance with Article 35 §§ 1 and 4 of the Convention.

For these reasons, the Court, unanimously,

Declares the application inadmissible.

Done in English and notified in writing on 26 February 2026.

Viktoriya Maradudina
Acting Deputy Registrar

Úna Ní Raifeartaigh
President

APPENDIX

Application raising complaints under Article 10 of the Convention (disproportionate measures against solo demonstrators)

Application no. Date of introduction	Applicant's name Year of birth	Representative's name and location	Location Date Purpose of the demonstration	Administrative charges Penalty	Final domestic decision Date Name of the court	Other complaints
37594/20 18/08/2020	**Darya Aleksandrovna GRISHINA** 1987	Memorial Human Rights Centre Moscow	Moscow, 01/11/2019, Support of LGBT community	article 20.2 § 5 of CAO, administrative fine of RUB, 10,000	16/12/2019, Moscow City Court	Art. 5 (1) - unlawful deprivation of liberty, including unrecorded detention and detention without a judicial order and any other legal basis - arrest, escorting to a police station, detention on 01/11/2019 for the sole purpose of drawing up the offence record, Art. 6 (1) - lack of impartiality of the tribunal in view of the absence of a prosecuting party in administrative-offence proceedings Art. 6 (1) - and Art. 6 (3) (d) - unfair trial in view of restrictions on the right to examine witnesses - inability to cross-examine in open court police officers on whose written statements the conviction was based, as well as a defence witness