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

THIRD SECTION

DECISION

Application no. 46115/20
Maksim Andreyevich KULIKOV
against Russia

The European Court of Human Rights (First Section), sitting on 28 August 2025 as a Committee composed of:

Diana Kovatcheva*, President*,
Canòlic Mingorance Cairat,
Vasilka Sancin*, judges*,

and Viktoriya Maradudina, *Acting Deputy Section Registrar,*

Having regard to the above application lodged on 14 September 2020,

Having deliberated, decides as follows:

FACTS AND PROCEDURE

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

The applicant's complaints under Articles 3 and 13 of the Convention concerning the inadequate conditions of detention during transport and lack of an effective domestic remedy in that regard were communicated to the Russian Government ("the Government").

THE LAW

The Court notes from the outset that, in the present case, the application was lodged more than six months after the end of the transport periods complained of by the applicant under Articles 3 and 13 of the Convention (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 18 September 2025.

Viktoriya Maradudina Acting Deputy Registrar	Diana Kovatcheva President

APPENDIX

Application raising complaints under Article 3 of the Convention (inadequate conditions of detention during transport)

Application no. Date of introduction	Applicant's name Year of birth	Means of transport Start and end date	Sq. m per inmate	Specific grievances	Other complaints
46115/20 14/09/2020	**Maksim Andreyevich KULIKOV** 1995	van, train 19/12/2019 to 21/12/2019	<0.5 m²	overcrowding, lack of fresh air, lack of or insufficient natural light, lack of or insufficient electric light, no or restricted access to toilet, poor quality of potable water, lack or insufficient quantity of food, insufficient number of sleeping places, lack of or poor quality of bedding and bed linen	Art. 13 - lack of any effective remedy in domestic law in respect of inadequate conditions of detention during transport