



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

Published on 19 October 2026

THIRD SECTION

Application no. 31995/25
Kriton FILOS
against Greece
lodged on 19 September 2025
communicated on 2 October 2026

SUBJECT MATTER OF THE CASE

The application concerns the applicant's complaints under Articles 6 and 13 of the Convention regarding excessive length of criminal proceedings and the absence of an effective remedy to that effect.

On 20 January 2005, the applicant was called to present his defence before the Patras Investigating Judge in the context of a criminal investigation (*κύρια ανάκριση*) for murder. On 30 May 2009, the Agrinio Assize Court acquitted the applicant by its judgment no. 12/2009. On 11 November 2013, the Patras Appeal Assize Court convicted the applicant of murder and imposed a ten-year prison sentence. On 1 February 2017, the Court of Cassation annulled the conviction by judgment no. 165/2017 and remitted the case to the appellate court. On 3 July 2018, the Patras Assize Court of Appeal convicted the applicant and imposed a ten-year prison sentence by judgment no. 92/2018. On 26 June 2019, the Court of Cassation annulled again the conviction and remitted the case back to the appellate court by judgment no. 1284/2019. On 17 March 2023, the Patras Assize Court of Appeal convicted the applicant and reduced the sentence to eight years of imprisonment by judgment no. 204/2023. On 6 February 2025, the Court of Cassation upheld the conviction and dismissed the applicant's appeal on points of law by judgment no. 267/2025, which was finalised on 25 May 2025.

Under Article 6 § 1 of the Convention, the applicant complains that the domestic criminal proceedings lasted more than 20 years, which was manifestly excessive. Under Article 13, he also complains that he did not have an effective remedy at his disposal for his complaint under Article 6 § 1. In particular, he contends that the remedy under Law no. 4239/2014 was not effective as (a) such requests had to be lodged separately at each level of jurisdiction leading to a “fragmentation” of the proceedings by level of jurisdiction, and (b) the procedure was costly and any sums awarded were very low also considering that applicants had to pay costs if their request was granted in part.

QUESTIONS TO THE PARTIES

1. Was the length of the criminal proceedings in the present case in breach of the “reasonable time” requirement of Article 6 § 1 of the Convention?

2. Did the applicant have at his disposal an effective domestic remedy for his complaint under Article 6 § 1, as required by Article 13 of the Convention?

In particular, did the remedy provided under Law no. 4239/2014 satisfy the requirements of Article 13 considering the applicable legal framework and its application by domestic courts, notably as regards (a) the fragmentation of proceedings and the lack of the possibility of examination of the overall length of proceedings, (b) the interpretation of the criteria for the assessment of the length of proceedings in line with the Court’s case-law, and (c) the adequacy of the sums awarded considering also the costs incurred (see *Vervele v. Greece*, no. 34012/20, §§ 50-85, 26 August 2025, with further references)?

3. The parties are invited to provide examples of decisions from the domestic courts’ practice in cases regarding the length of criminal proceedings under Law no. 4239/2014.

In particular, the Government are invited to submit data on:

- the number of claims for just satisfaction relating to proceedings before criminal courts which have been rejected and the periods which were taken into consideration,
- the number of claims for just satisfaction relating to proceedings before criminal courts which have been granted or granted in part, the periods taken into consideration and the amount of compensation which has been awarded in each of them.

In submitting the above-mentioned data, the Government are invited to provide an adequate sample of domestic decisions and copies of those decisions to enable the Court to comprehensively analyse the domestic courts’ practice under Law no. 4239/2014 regarding the length of criminal proceedings (compare *Vervele*, cited above, §§ 55-79).