

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Colleton County  
Honorable Robert J. Bonds, Circuit Court Judge

Appellate Case No. 2023-001747

THE STATE.....*Respondent,*

v.

RYAN LENARD MANIGO.....*Petitioner.*

**MOTION FOR LEAVE TO FILE *AMICI CURAIE*  
BRIEF**

Pursuant to Rule 213 of the South Carolina Appellate Court Rules, the South Carolina Public Defender Association respectfully submit this Motion for Leave to File a Brief of *Amici Curaie* on behalf of Petitioner Ryan Lenard Manigo.

**STATEMENT OF INTEREST**

The Amicus is a group that represents and advocates for indigent persons charged with crimes in South Carolina. The South Carolina Public Defender Association (“PDA”) is a non-profit corporation created to promote and support the advancement of indigent defense in the State of South Carolina. Membership in the PDA is made up of the Circuit Public Defenders, along with

their chiefs, deputies and assistant public defenders, from every Judicial Circuit in South Carolina, as well as attorneys of the South Carolina Commission on Indigent Defense (“SCCID”) in both the Appellate Defender and Capital Defender Divisions. With a total of more than 300 members, the PDA membership provides criminal defense services to indigents accused of criminal offenses in the State, County, and Municipal Courts throughout South Carolina. PDA members represent the majority of the people accused of serious misdemeanors and felonies in General Sessions Court throughout the state. A report from the Budget and Control Board estimated that, in 2006, PDA members handled eighty-five percent (85%) of the cases disposed of in General Sessions Court throughout South Carolina. PDA members routinely represent indigent clients in capital litigation and in cases in which the state is seeking life without the possibility of parole.

The PDA, through its officers and board of directors, has taken an active role as a stakeholder in South Carolina’s criminal justice system. The PDA provides training for its members; and is directly involved with SCCID in developing performance standards for indigent defense in South Carolina, with several of its board members acting as members of SCCID’s committee on standards and its president acting as vice chair of that committee. The PDA continues to actively participate in the state legislative process as a resource for the legislature, providing PDA membership’s unique knowledge of and professional experience in the legal representation of indigent people being criminally prosecuted by the government. Additionally, the PDA has submitted comments on proposed rules of criminal procedure and appeared before this Court to present those comments. The PDA has appeared as *amicus curiae* before this Court and the South Carolina Court of Appeals in other cases.

The PDA thus has a strong interest in Appellant Ryan L. Manigo’s case and the questions it raises about the release of Mr. Manigo’s pre-trial recorded jail calls, and the procedures for release and, or, review.

WHEREFORE, the South Carolina Public Defender Association respectfully move this court for leave to file its *amicus* brief on this issue.

Respectfully submitted,

S:/ Melissa A. Inzerillo

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