

COURT OF APPEALS OF SOUTH CAROLINA

State v. Ryan Lenard Manigo

Opinion No. 6149 (S.C. Ct. App. June 24, 2026) · No. 2024-001818 · Decided June 24, 2026

SUMMARY

The South Carolina Court of Appeals dismissed Ryan Lenard Manigo's appeal as arising from an interlocutory order that was not immediately appealable. The court held that Manigo, a pretrial detainee, could not demonstrate cognizable prejudice before trial, conviction, or sentencing, and noted that issues concerning publicity and admissibility could be addressed through later proceedings.

CASE DETAILS

COURT	Court of Appeals of South Carolina
WRITING FOR THE COURT	Thomas, J.; McDonald, J.; Turner, J.
JURISDICTION	South Carolina Court of Appeals
DECIDED	June 24, 2026
DOCKET	2024-001818
DISPOSITION	dismissed
PROCEDURAL POSTURE	Manigo appealed a circuit court order allowing the release of his pretrial detention telephone calls to the media. The Court of Appeals dismissed the appeal because the order was interlocutory and not immediately appealable.
STANDARD OF REVIEW	The court reviewed appealability as a jurisdictional matter under South Carolina's final-judgment and interlocutory-appeal rules and statutes.
PRECEDENTIAL VALUE	published
PARTIES	Ryan Lenard Manigo v. The State of South Carolina

TOPICS

interlocutory appeal

appellate jurisdiction

final judgment rule

criminal procedure

mootness

PRACTICE AREAS

appellate procedure

criminal procedure

Freedom of Information Act

constitutional law

QUESTIONS PRESENTED

1. Whether the circuit court's order permitting release of Manigo's pretrial telephone calls was a final or otherwise immediately appealable order.
2. Whether the appeal should be dismissed as premature because Manigo had not yet been tried, convicted, or sentenced.

HOLDINGS

1. The order was an interlocutory order that was not immediately appealable under South Carolina law because it did not constitute a final judgment and did not fall within an exception in section 14-3-330.
2. The court declined to reach the merits of the remaining arguments because dismissal of the appeal on appealability grounds was dispositive.

KEY QUOTATIONS

“We hold the circuit court's order allowing the release of the pretrial telephone calls is an interlocutory order that is not immediately appealable.”

“An appeal in a criminal case must attend the final judgment rendered on the indictment.”

“South Carolina law has long held that a criminal defendant may not appeal until a conviction and sentence have been rendered.”

FACTUAL BACKGROUND

Manigo was a pretrial detainee in the Colleton County Detention Center after being arrested on July 2, 2023, and charged with numerous serious offenses, including murder and other violent crimes. While the charges remained pending, media outlets released recordings of his jail telephone calls. Manigo claimed the release violated the South Carolina Freedom of Information Act, his federal and state constitutional rights, statutory exemptions, and public policy.

PROCEDURAL HISTORY

Manigo was arrested and charged in Colleton County. After media outlets released his jail telephone calls, he appealed the circuit court's order permitting release of the calls, asserting Freedom of Information Act, constitutional, statutory-exemption, and public-policy grounds. The Court of Appeals dismissed the appeal without reaching the merits because no final judgment or immediately appealable order existed.

DISPOSITION

dismissed

CASES CITED

- State v. Hubbard, 277 S.C. 568, 290 S.E.2d 817 (1982)
- State v. Miller, 289 S.C. 426, 346 S.E.2d 705 (1986)
- Brown v. Se. Servs., H.H.I., LLC, 446 S.C. 105, 917 S.E.2d 925 (Ct. App. 2025)

- Ex parte Wilson, 367 S.C. 7, 625 S.E.2d 205 (2005)
- State v. Wilson, 387 S.C. 597, 693 S.E.2d 923 (2010)
- State v. Looper, 421 S.C. 384, 807 S.E.2d 203 (2017)
- State v. Hill, 314 S.C. 330, 444 S.E.2d 255 (1994)
- In re Lorenzo B., 307 S.C. 439, 415 S.E.2d 795 (1992)
- Parsons v. State, 289 S.C. 542, 347 S.E.2d 504 (1986)
- State v. Washington, 285 S.C. 457, 330 S.E.2d 289 (1985)
- State v. Black, 400 S.C. 10, 732 S.E.2d 880 (2012)
- State v. Kelsey, 331 S.C. 50, 502 S.E.2d 63 (1998)
- State v. Owens, 293 S.C. 161, 359 S.E.2d 275 (1987)
- State v. Mueller, 319 S.C. 266, 460 S.E.2d 409 (Ct. App. 1995)
- Futch v. McAllister Towing of Georgetown, Inc., 335 S.C. 598, 518 S.E.2d 591 (1999)
- State v. McKnight, 287 S.C. 167, 337 S.E.2d 208 (1985)